



Brimbank
City Council

DRAFT Brimbank Housing & Neighbourhood Character Background Report

March 2023

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Prepared by Mesh in collaboration with Brimbank City Council

Draft Brimbank Housing & Neighbourhood Character Background Report

Brimbank Housing Strategy & Neighbourhood Character Strategy Project

Prepared by Mesh in collaboration with Brimbank City Council

March 2023

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Abbreviations

ACZ	Activity Centre Zone
CBD	Central Business District
CDZ	Comprehensive Development Zone
Covid-19	Coronavirus 2019
CZ	Commercial Zone
DCPO	Development Contributions Plan Overlay
DDO	Design and Development Overlay
DELWP	the Department of Environment, Land, Water and Planning
DoT	the Department of Transport
DPO	Development Plan Overlay
DTP	the Department of Transport and Planning
ESD	Environmentally Sustainable Development or Design
ESO	Environmental Significance Overlay
GRZ	General Residential Zone
HO	Heritage Overlay
LSIO	Land Subject to Inundation Overlay
MAEO	Melbourne Airport Environs Overlay
MeAC	Metropolitan Activity Centre
MUZ	Mixed Use Zone
NCO	Neighbourhood Character Overlay
NEIC	National Employment and Innovation Cluster
NHFC	National Housing Finance and Investment Corporation
NHHA	National Housing and Homelessness Agreement
NRAS	National Rental Affordability Scheme
NRZ	Neighbourhood Residential Zone
PAO	Public Acquisition Overlay
PPF	Planning Policy Framework
PPN	Planning Practice Note
PPTN	Principal Public Transport Network
PSA	Planning scheme amendment
ResCode	Residential Code
RGZ	Residential Growth Zone
SBO	Special Building Overlay
SEIFA	Socio-Economic Indexes for Areas
SHWEP	Sunshine Health, Wellbeing and Education Precinct
SLO	Significant Landscape Overlay
VIF	Victoria in Future

Glossary of Terms

Term	Definition
20-minute neighbourhood	A neighbourhood in which residents can access most of their daily needs (e.g., via shops, services, parks, healthcare facilities) within a 20-minute return walk from home.
Activity centre	A lively community hub that generally contains areas for shopping, working, meeting, relaxing and living.
Adaptable housing	Housing that is designed to be used by everyone and accommodate changes in family size or family member mobility over time.
Affordable housing	Housing that is appropriate for the needs of very low, low and/or moderate income households.
Community housing	Housing that is provided to individuals and families with low to moderate incomes through a partnership between the State Government and registered housing associations.
Contemporary development	New housing development that has replaced traditional housing stock in older suburbs, or that has been recently developed in newer suburbs.
Contributory heritage buildings	Buildings that make a significant contribution to the heritage character of an area.
Gentrification	The process of neighbourhood change through an influx of more affluent residents and businesses that cater to higher-income earners.
Greenfield	Undeveloped land identified for future residential, industrial or commercial development and use.
Green Travel Plan	A plan containing initiatives that enable and encourages residents to travel more sustainably.
High density development	As used in this Background Report, development of four or more storeys, containing apartments or units.
Higher density development	As used in this Background Report, a descriptor that encompasses both medium density development (2–3 storeys) and high density development (4+ storeys).
High scale development	As used in this Background Report, development of three or more storeys. (In contrast to 'low scale development' – see below.)
Housing diversity	A variety of housing sizes and types. Seen as desirable due to the premise that people need different types of housing depending on their lifestyle and life stage.

Housing form	The physical type of dwelling, often associated with a certain age or lifestyle. Includes detached homes/separate houses, semi-detached, townhouses, unit, apartments, and specialised housing (e.g., retirement villages, aged care facilities, student housing).
Housing location	Where a dwelling is within a geographical area. Often thought about in association with proximity to desired features or attractors.
Housing scale	Refers to the size of a dwelling. Measured by floor area, number of bedrooms, and/or size of lots.
Housing tenure	Ownership status of a dwelling, typically either homeownership or rental.
Incremental housing change	As used in the Victorian Planning System, this describes areas suitable for housing growth with more diverse types of housing that respond to, yet help evolve, the existing character of a neighbourhood.
Infill development	Development of vacant or under-utilised land in within an area that is already largely developed.
Liveable/liveability	The quality of a place being pleasant to live in due to it being appropriately or desirably safe, accessible, attractive, inclusive, affordable, sustainable, accommodating of daily needs and providing of opportunities for education, employment and enrichment.
Low scale development	As used in this Background Report, development of one to two storeys.
Metropolitan activity centres (MeACs)	Larger activity centres within metropolitan Melbourne that provide a range of employment, housing and activities and are well served by public transport.
Major activity centres	Suburban activity centres that provide services, employment, housing, public transport and opportunities for social interaction.
Medium density development	As used in this Background Report, development that has dwellings or apartments in buildings of two to three storeys. This can include townhouses, unit developments and low scale apartment buildings.
Minimal housing change	As used in the Victorian Planning System, this describes areas unsuitable for housing growth due to their special characteristics or constraints.
National Employment and Innovation Cluster (NEIC)	An area within Melbourne of concentrated employment and business activity centred around medical research and tertiary institutions.
Neighbourhood character/ character	The sense of place and community meaning of a neighbourhood, derived from a combination of development patterns, built form and scale, architectural and roof styles and other notable design or landscaping characteristics.
Neighbourhood character precincts	Areas identified by Council (through a Neighbourhood Character Study) as having qualities that give them a unique character.

Non-contributory heritage buildings	Buildings that do not make a significant contribution to the heritage character of an area but that still fall under a HO.
Overlooking	The action of looking into the private internal or external space of an existing dwelling, made possible by a building that provides a direct line of sight into such an area.
Overshadowing	The action of a building or structure casting a shadow of open space or habitable space.
Planning Policy Framework (PPF)	The policy content of the planning scheme that provides state, regional and local context for spatial planning and decision making by planning and responsible authorities.
Priority precincts	In Victoria, areas around transport nodes that will be a focus of employment and housing growth.
ResCode	The collective name for Clauses 54, 55, 56 and 58 in the Victorian Planning Scheme. These clauses set objectives and standards for residential development for one dwelling on a lot (Clause 54), two or more dwellings on a lot (Clause 55), subdivision (Clause 56), and apartment buildings (Clause 58).
Schedule	As used in the Victorian Planning System, a set of objectives, standards, and requirements and decision guidelines attached to either a zone or an overlay.
Substantial housing change	As used in the Victorian Planning System, this describes areas where development will occur at a substantially different scale and intensity compared to other areas of a given municipality.
Super hub	Term designating an area as one that will contain key regional transportation links.
Universal design	Design that is accessible to all people, no matter their age or ability.
'Your Say' website	A website run by a Council or State Government that allows residents to give input into proposed plans, strategies and initiatives.

Executive Summary

The City of Brimbank (Brimbank) will see dramatic changes in the coming years—changes that demand a new approach to planning for housing.

Not only are Brimbank's population demographics shifting, but the municipality is anticipating an influx of new residents as a result of State and Federal investment in significant projects being delivered over the next ten years. A third of the municipality has been designated a National Employment and Innovation Cluster (NEIC) for employment, innovation and health related uses. Within the NEIC, Sunshine and surrounds has been designated a priority precinct for urban renewal (one of only a handful across Metropolitan Melbourne), with State Government led precinct planning underway, and new rail services and infrastructure (including Melbourne Metro and the Melbourne Airport Rail) to connect the municipality both within and beyond its borders. These changes will bring opportunities, yet they will also bring the challenge of preserving Brimbank's existing amenity and character while accommodating growth. While Brimbank has more than enough capacity to meet its forecasted housing need, it faces the task of accommodating growth in the right locations.

This Draft Background Report (Background Report) is the result of extensive research into Brimbank's residential context and analysis of its opportunities and constraints. It is the first major step of Brimbank City Council's project to develop a new Housing Strategy, a Neighbourhood Character Strategy and a Residential Development Framework (the Project), and it will inform strategies which seek to replace Council's 2014 housing strategy, *Home and Housed*. Its approach builds upon work undertaken for the 2019 Draft Neighbourhood Character Study, while factoring in new State planning policy and taking an on-the-ground approach to cataloguing existing neighbourhood features.

The Background Report consists of two main sections:

Part 1: Context explains the approach to the Project and the context of Brimbank.

- > The **Introduction** chapter explains the drivers and scope of the Project as well as Brimbank's past actions related to housing and neighbourhood character.
- > **Brimbank's Context** chapter details its location and features, as well as community and Council aspirations.
- > The **Policy Context** chapter gives an overview of Federal, State and local policy that illuminates Brimbank's context and shapes the Project.

Part 2: Influences catalogues and analyses influences on housing, neighbourhood character and the future Residential Development Framework (RDF).

- > The **Housing Influences** chapter explains the drivers of housing need and analyses housing growth opportunities and constraints.
- > The **Neighbourhood Character Influences** chapter explains the drivers of neighbourhood character, details the planning influences on character in Brimbank and presents a synthesis in the form of emerging character precincts.
- > The **Conclusion, Emerging Themes and Next Steps** chapter synthesises the previous sections into emerging themes that will become aims for the Housing Strategy, Neighbourhood Character Strategy and RDF, which will to be produced in the next stages of the Project.

The **Appendices** contain further analysis of strategic actions, Brimbank City Council's current application and use of zones, existing and future redevelopment sites and relevant VCAT cases. They also contain the **Suburb Profiles**, which detail the key characteristics of each suburb as well as the main contributors and threats to their neighbourhood character.

Context

Brimbank's context is key to understanding the necessity for—and the potential of—a new approach to housing and neighbourhood character. Brimbank City Council began the process of changing its residential zone schedules and defining neighbourhood character in 2018 (in response to 2017 State policy changes). However, these efforts were curtailed by the release of State advice in 2019 that redefined best practice for planning for residential growth. The current Project renews these efforts. It will replace the 2014 housing strategy, *Home and Housed*, and produce a Neighbourhood Character Strategy and RDF.

The Project also comes at a critical moment in Brimbank's evolution. With major projects, including Melbourne Metro upgrades (including upgrades to Albion and Sunshine Stations), Level Crossing Removal Project works, the addition of a Melbourne Airport Rail, and the development of the Sunshine 'superhub'¹ imminent, the municipality is expected to experience major shifts to its economy, its physical and social infrastructure and, as a result, its population. At the same time, Brimbank's population is experiencing natural demographic shifts, with an increasing proportion of residents moving into retirement age and beyond, and it remains a desirable location for overseas migrants. Both of these are likely to increase the demand for different forms of housing.

Brimbank's residents support a degree of residential growth, yet they are concerned about preserving Brimbank's heritage, relative affordability, and residential character. Council's task will be to facilitate development that preserves Brimbank's existing amenity while creating space for new amenity and growth. At the moment, Brimbank's zoning and planning scheme policy is clear about where growth should occur, but it is achieving mixed results. New housing and neighbourhood character policy will not only clarify expectations, but it will also enable Brimbank to fulfill its role in State and Federal policy that aims to create 20-minute neighbourhoods and to concentrate growth around transport rich locations and activity centres.

Key influences

Housing

Brimbank's population is increasing, aging, and becoming more diverse. This is driving a demand for housing, as well as a wider range of housing types. While the demand for detached housing currently remains high, the availability of this type of housing is declining. The development of the Sunshine Metropolitan Activity Centre (MeAC) may contribute to the viability and attractiveness of high density development, but this remains to be seen. According to work done by Urban Enterprise,² Brimbank's existing residential areas have more than enough capacity to meet forecasted housing needs. The Housing Strategy will need to consider how it can best facilitate diverse, affordable and economically viable housing, taking into account the municipality's opportunities and constraints.

Opportunities for housing growth include areas near activity centres, public transport rich locations, high quality open space and community facilities. This is especially true for areas that are also walkable (i.e., gridded and permeable, with high quality cycling and pedestrian infrastructure and attractors within a short distance) and that have a critical number of attractors in close proximity, making them highly liveable. In Brimbank, these areas are concentrated around key transport corridors and activity centres, especially the Sunshine/Albion and St Albans activity centres and, to a lesser extent, in Sydenham (around Watergardens Shopping Centre). The Housing Strategy will aim to direct housing growth and diversity to these areas.

Constraints on housing growth in Brimbank include industrial and/or contaminated land, airport environs, road and rail barriers, areas of cultural sensitivity, areas of special character, areas or buildings of heritage value and areas subject to inundation and flooding. These are mostly concentrated in the southern areas of the municipality. Sunshine in particular is impacted by industrial interfaces and areas of heritage in close proximity to the activity centre.

¹ 'Superhub' refers to the range of transportation additions and upgrades concentrated around Sunshine Station.

² Urban Enterprise 2021 (updated 2022), *Brimbank Housing Strategy: Background Analysis*, Brimbank City Council, p. 3.

Neighbourhood Character

Controls within the planning system, State and local policy, and physical siting and design elements all shape neighbourhood character, or the cumulative impact of public and private realms that contributes to an area's 'sense of place'. To get a sense of how neighbourhood character is expressed throughout Brimbank, this Project investigated overarching influences on character through:

- > Examination of Federal, State and local policy, including the 2019 Draft Neighbourhood Character Study.
- > Desktop study of eras of development, interfaces, and patterns of development and redevelopment.
- > Careful reading and analysis of residential zone schedules and application of overlays.
- > Analysis of recent VCAT decisions in Brimbank dealing with neighbourhood character.

The investigation found that while currently planning tools (particularly planning scheme policy and zone schedules) emphasise a desire for high quality development that respects neighbourhood character, there is limited guidance in the planning scheme about the preferred neighbourhood character of different areas of Brimbank. This has resulted in an unclear path for achieving incremental change that respects neighbourhood character in the General Residential Zone (GRZ) and Neighbourhood Residential Zone (NRZ) and for to achieving substantial change in the Residential Growth Zone (RGZ)—where neighbourhood character is not a consideration, but design objectives must be achieved. Thus far, similar multi-unit developed has occurred across the municipality, regardless of zoning.

Taking an empirical approach, this Project also investigated specific design and siting elements via site visits to each of Brimbank's suburbs. These were then distilled into lists of contributors and threats to neighbourhood character in each area. Contributors included maintained or increased vegetation and landscaping, consistency of siting and scale, consistent or complementary colours and materials, low to moderate scale fencing, integrated infill development and connection to adjacent areas. Threats included increased built form bulk or scale, reduced or limited vegetation, poorly integrated development, high scale fencing, change in materiality or style, vehicle access and parking that took away from other types of amenity, and limited connectivity or accessibility. These contributors and threats occurred in different combinations and presented differently in each suburb.

During this process, areas of significance were also identified within Sunshine West, Keilor and Albion. These areas may be appropriate as minimal change areas under the RDF.

Finally, both overarching planning influences and the lists of contributors were used to define six emerging neighbourhood character precincts, or areas that are internally similar and at the same time distinct from other areas of the municipality. These will be further assessed with stakeholders and used as draft inputs into the Neighbourhood Character Strategy. It is expected that these will evolve further during the preparation of the Neighbourhood Character Strategy and the RDF.

Conclusion, emerging themes and next steps

The Background Report will inform the new Housing Strategy, Neighbourhood Character Strategy and ultimately an RDF, which will be the overarching plan for housing growth in Brimbank over the next 20 years.

The aims that the Housing Strategy, Neighbourhood Character Strategy and RDF will need to address and balance are **growth, diversity, amenity, sustainability, designing for density, respecting neighbourhood character and celebrating heritage and character**. Brimbank City Council can work toward these aims through planning tools, such as zone schedules, overlays and planning scheme policy, and through Council strategies, policies and actions that complement planning controls.

The next steps for the Project will involve identifying key sites and locations and exploring planning control and policy opportunities to balance and achieve these aims.

Key conclusions

- > Due to changes to State policy, Brimbank City Council's current use of residential zones does not reflect best practice, and the zones are not achieving their intended outcomes.
- > There is limited guidance for housing growth and neighbourhood character expectations for residential areas of Brimbank. As a result, the RGZ and NRZ are achieving infill development at similar rates, and RGZ areas are not achieving their full growth potential.
- > There are opportunities to strengthen policy that facilitates high density housing around the Sunshine and St Albans Activity Centres, and to a lesser extent around Watergardens. This would capitalise on the existing liveability of these areas and further the State policy of creating 20-minute neighbourhoods.
- > Planned investment in Sunshine is expected to lead to residential growth and improve the commercial viability of high density housing forms.
- > There are a range of Council policies to support housing, growth, diversity and affordability, but these policies need complementary spatial planning controls.
- > While areas of Brimbank have differing levels of amenity, there are significant areas throughout the municipality that the planning scheme can better work to respect and protect. The identified emerging character precincts will be further refined and used to achieve this goal.
- > The next steps of the Project will be to identify specific locations and policy options that will balance and support the aims of growth, diversity, amenity, sustainability, designing for density, respecting neighbourhood character and celebrating heritage and character.
- > The ultimate output of the Project will be a new Housing Strategy, a Neighbourhood Character Strategy, and RDF.



Brimbank
City Council

Part 1 Context

Introduction

- 1.1 What is the Housing and Neighbourhood Character Project?
- 1.2 What is Driving the Project?
- 1.3 Project Background and Context
- 1.4 How are we Approaching this Project?

Brimbank's Context

- 2.1 Brimbank's Location and Features
- 2.2 Snapshot of Brimbank
- 2.3 Community Aspirations
- 2.4 Role of Council
- 2.5 Summary of findings

Policy Context

- 3.1 Federal
- 3.2 State
- 3.3 Local
- 3.4 Sunshine NEIC and Sunshine Precinct
- 3.5 Abutting Municipalities
- 3.6 Summary of findings

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Part 1: Context

1. INTRODUCTION

Brimbank City Council is planning for a new approach to housing growth and change that balances the needs of a changing and diverse population with the desire to protect and enhance valued neighbourhood character.

1.1 What is the Housing and Neighbourhood Character Project?

Mesh Planning has been engaged by Brimbank City Council to prepare a Housing Strategy, Neighbourhood Character Strategy and a Residential Development Framework (RDF). Together, these are known as the Project.

The Project will provide guidance on planning for housing development across the municipality, in a way that:

- > Meets the needs of Brimbank's diverse and changing population.
- > Takes into consideration any potential housing constraints, such as landscape, heritage or other land capability constraints.
- > Respects neighbourhood character.

The purpose of each document is summarised below:

- > The **Housing Strategy** – A plan to meet the housing needs of existing and future residents by providing opportunity for a broad mix of housing in the right locations
- > The **Neighbourhood Character Strategy** – A guide to the preferred design and form of new housing.
- > The **RDF** – Balances the objectives of housing and neighbourhood character to set a plan for housing over the next 20 years.

The scope of the Project is residentially zoned land within Brimbank. While the Project will have regard to other parts of the municipality that will accommodate substantial housing growth (e.g., Brimbank's major activity centres), they will not be the focus of the strategies produced.

This document is a background report that will inform the development of the Housing Strategy, Neighbourhood Character Strategy and RDF. It provides an analysis of key opportunities and constraints for housing growth and articulates the current influences on neighbourhood character. Its analysis complements the analysis of Brimbank's current capacity for housing growth and the projected needs of the future population undertaken by Urban Enterprise in their 2021 *Brimbank Housing Strategy Background Report*.³

Together, the Mesh and Urban Enterprise background reports will be used to inform areas of substantial, incremental and minimal housing change in a future Housing Strategy and to define neighbourhood character precincts in the future Neighbourhood Character Strategy.

³ Urban Enterprise 2021 (updated 2022), *Brimbank Housing Strategy: Background Analysis*, Brimbank City Council.

1.2 What is Driving the Project?

Housing need varies as communities grow and change over time, and Brimbank is undergoing rapid change. Brimbank's population is growing, ageing and becoming more culturally diverse. Brimbank is also changing as a result of large scale investment in infrastructure, including the construction of the Melbourne Airport Rail, the construction of a new train station at Keilor East, upgrades to Albion and Sunshine Stations (including a new regional platform) and three level crossing removals on the Deer Park train line, with potential upgrades to electrify the V/Line service.⁴

Combined with the designation of the area around Sunshine Hospital as the Sunshine Health, Wellbeing and Education Precinct (SHWEP), designation of the broader area as an NEIC, and the ongoing development of the Sunshine Metropolitan Activity Centre (MeAC), investment within the municipality will provide significant health, wellbeing and employment opportunities to Brimbank.

The recent designation of Sunshine as a priority precinct by State Government will also be an attractor for investment and a catalyst for housing growth. This precinct planning is being led by the Department of Transport and Planning (DTP) for locations such as Sunshine Station and Albion. However, as the estimated extent of growth in this area is not yet known, and as this area is outside of the scope of this Project, it has been factored in to the Project a limited way, keeping in mind that increased growth in this area will likely have an influence on neighbouring residential areas.

In this context, Brimbank City Council must plan to meet the varied housing needs of its current and future residents. Provision of sufficient, suitable and affordable housing is a critical component of a liveable neighbourhood. Housing provides basic shelter for the residents of Brimbank, and the form of housing and its design contributes to and shapes the character of neighbourhoods.

Council commenced the process of preparing planning policy for neighbourhood character across Brimbank in 2018. At this time, there was limited direction from State Government⁵ on how to approach neighbourhood character studies or strategies. However, following consultation on the Draft Neighbourhood Character Study⁶ in 2019, the Department of Environment, Land, Water and Planning (DELWP)⁷ set new expectations for how councils should plan for housing and neighbourhood character. This resulted in the necessity for revisions to the 2019 study. In 2019, new direction was also provided by DELWP in Planning Practice Note (PPN) 90 – *Planning for Housing* and PPN91 – *Reforms to the Residential Zones*. These PPNs provided guidance on how to better balance housing and neighbourhood character objectives and how to implement them through planning controls (e.g., zones, overlays and schedules).

These planning policy changes, as well as changes in Brimbank's population and development context, means that there is now a need to review Brimbank's existing Housing Strategy, *Home and Housed*, and update the planning framework for Brimbank's residential areas. The integration of neighbourhood character planning with planning for housing more broadly also means that the previous Draft Neighbourhood Character Study must be reviewed and updated concurrently with the Housing Strategy.

The culmination of this Project—the RDF—will seek to resolve this issue of accommodating growth while simultaneously protecting and enhancing neighbourhood character.

⁴ Provided the Western Rail Plan project secures funding.

⁵ PPN43 provides guidance on understanding neighbourhood character and responding to neighbourhood character objectives but does not explicitly guide preparation of strategic policy.

⁶ Mesh 2019, Draft Brimbank Neighbourhood Character Study, Brimbank City Council.

⁷ Known as DTP as of 2023.

1.3 Project Background and Context

This Project was initiated by Council following extensive work in relation to housing and neighbourhood character and in response to changes to planning policy and guidance relating to housing.

Figure 1: Project background and context

Year	What happened	Outcome
2014	Brimbank Housing Strategy <i>Home and Housed</i> approved and implemented.	The new suite of residential zones was implemented across Brimbank.
2017	<i>Plan Melbourne 2017-2050</i> adopted by State Government as the new metropolitan strategy.	Set policy direction to accommodate Victoria's population growth in liveable neighbourhoods.
2017	Changes to residential zones by State government.	Changed the way residential zones can be used, including direct changes to the zones themselves, to direct housing and neighbourhood character outcomes.
2018	Draft Brimbank <i>Neighbourhood Character Study</i> prepared.	Identified character precincts and recommended changes to residential zone schedules. Draft Study placed on hold, following community consultation, due to new policy guidance in PPN90 and PPN91.
2019	State Government's PPN90 and PPN91 released.	Provided updated guidance in relation to housing, character and the use of residential zones. Triggered a requirement for Council to update its RDF by reviewing its Housing Strategy in conjunction with the Draft Neighbourhood Character Study.
2019	<i>Victoria in Future</i> population forecasts released.	Identified that Melbourne's population growth is expected to increase at a higher rate than forecast in <i>Plan Melbourne 2017-2050</i> .
2020	Council commissioned peer review of the Draft Neighbourhood Character Study.	Identified recommendations to review the Housing Strategy and Draft Neighbourhood Character Study to ensure they would align with updated State policy.
2021, updated 2022	Council commissioned <i>Housing Strategy Background Analysis</i> .	Identified housing supply, capacity, and demand, based on analysis of demographics, population projections and the market. It is a key input into the current Project.

1.4 How are We Approaching this Project?

The Project is being undertaken in four phases, with opportunities for community and stakeholder engagement at key points.

Figure 2: Project progress

Early – Mid 2022	Phase 1: Project Planning	Initial project setup.	-
Mid 2022 – Early 2023	Phase 2: Research + Analysis	Analysis of the opportunities and constraints relating to housing and neighbourhood character in Brimbank. Preparation of Draft Background Report to capture findings. Draft Background Report to be presented to Council for noting.	Engagement with various stakeholders. Preliminary community engagement via 'Your Say' website. Findings within Draft Background Report to be tested with community as part of next round of engagement, if supported by Council.
Early 2023 – Late 2023	Phase 3: Strategy Preparation	Preparation of the Housing Strategy, Neighbourhood Character Strategy and RDF. Draft strategies to be presented to Council for endorsement for consultation.	Engagement with various stakeholders during preparation of draft strategies. Updates to community via website. Subject to Council endorsement of draft strategies, community consultation to be undertaken.
Late 2023 – Early 2024	Phase 4: Finalisation + Implementation	Make changes to strategies, where appropriate, following community consultation. Preparation of planning scheme tools and planning scheme amendment (PSA) documents. Take final draft strategies, final draft Background Report and PSA documents to Council for a decision on whether to progress with the proposed amendment.	Following decision of Council to undertake statutory exhibition, exhibition of the PSA, including the Housing Strategy, Neighbourhood Character Strategy RDF and associated planning controls.

2. BRIMBANK'S CONTEXT

2.1 Brimbank's Location and Features

Brimbank is a fast-growing middle-ring municipality located in western Melbourne. Brimbank comprises a mix of established residential neighbourhoods, large scale employment and industrial areas, and 55 activity centres (including Sydenham, Deer Park, Brimbank Central and St Albans Major Activity Centres, and the Sunshine MeAC) across the municipality.

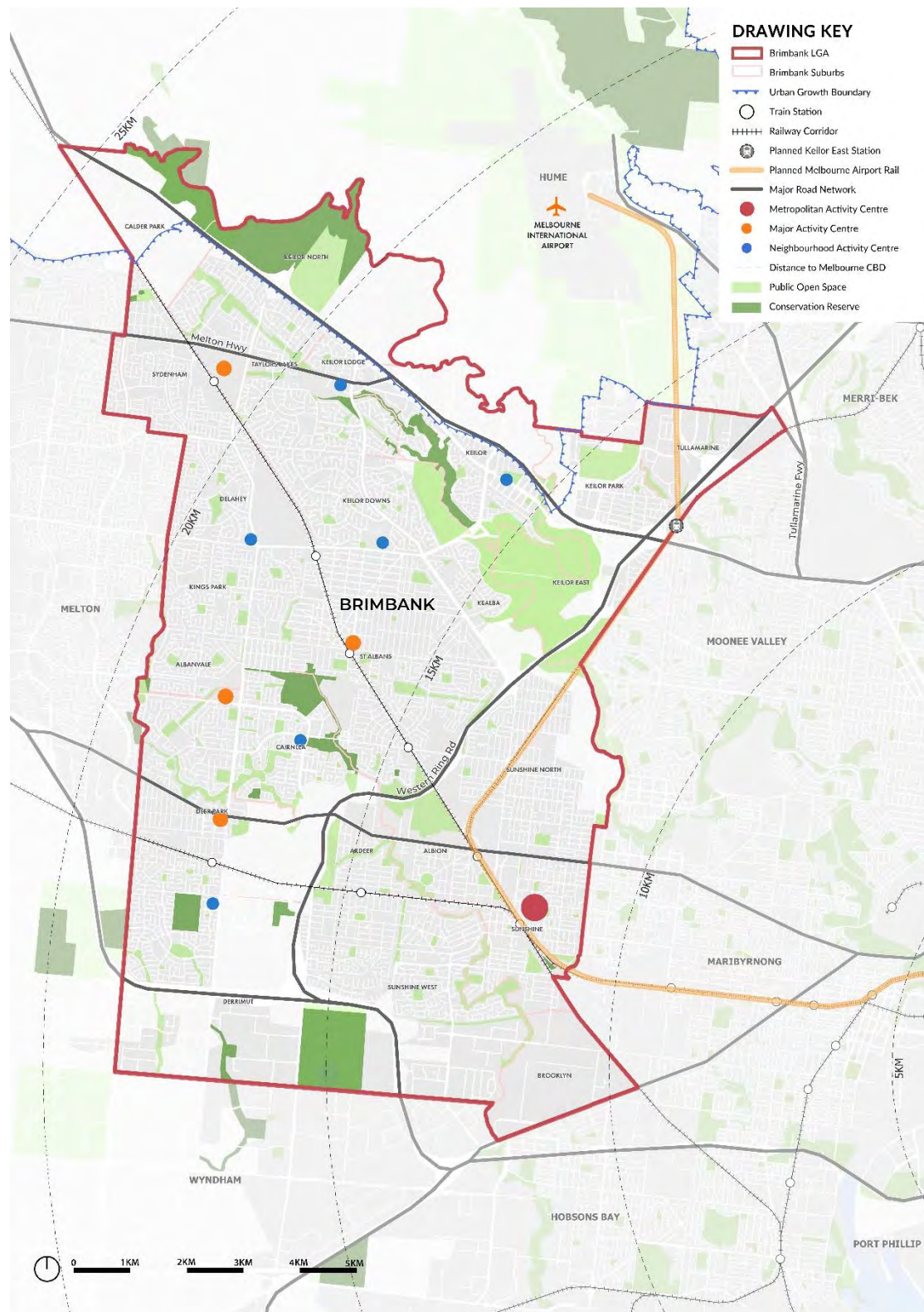
The municipality has an interface to the greenfield growth municipalities of Hume, Melton and Wyndham, and to the surrounding established municipalities of Hobsons Bay, Maribyrnong, Moonee Valley and Merri-bek (formerly Moreland).

Brimbank is served by an extensive higher order road network that includes the Calder Highway, the Western Ring Road, Deer Park Bypass, Melton Highway, Ballarat Road, and passenger and freight rail connections along the Sydenham rail line, Melbourne-Ballarat and Melbourne-Bendigo V-lines and the Melbourne to Sydney passenger and freight lines. These provide important connections to the Melbourne Central Business District (CBD), the Melbourne Airport and surrounding municipalities, with future investment in transport projects set to improve the network further. This investment and infrastructure, while beneficial, will also have a barrier effect in some areas of the municipality, often brought about by there being a limited number of crossing points. Combined with a lack of arterial road delivery, particularly east-west, cross municipal and local travel and accessibility will likely be constrained.

Figure 3: Brimbank key statistics

Features	Area of 123km ²
	Comprises 24 suburbs
	1 Metropolitan Activity Centre
	5 Major Activity Centres
	10–20km from the Melbourne CBD

Figure 4: Brimbank context plan



2.2 Snapshot of Brimbank

Brimbank is a diverse municipality, with a growing population that has varied housing needs.

Figure 5: Brimbank demographic data

Population and Age

194,618 estimated resident population in **2021**.



Median age of 37 in 2021
(comparable to metropolitan Melbourne).

Ageing population.

Household Size and Type

71,810 total dwellings in **2021**.



Average household size of 2.9 per dwelling
(larger than Melbourne average).

80% separate houses.

82% of dwellings have 3 or more bedrooms.

Cultural and Linguistic Diversity

Attractive location for overseas migrants
(particularly from Asia), resulting in a diverse community.



Vietnamese, Australian, and English were the top ancestries in **2021**.

Education and Employment

\$1,506 average weekly household income
(notably less than metro Melbourne average of \$1,901).



11% unemployment rate

(considerably higher than metro Melbourne
average of 7%).

Second most disadvantaged municipality in
metropolitan Melbourne
(930 Socio-Economic Indexes for Areas [SEIFA] Score).

Housing Tenure Affordability

Fairly even split of housing tenures
full ownership **31%**
ownership with mortgage **31%**
renting **26%**



More affordable housing than neighbouring
inner metro municipalities.

Median rent \$380 per week
(slightly lower than Melbourne average).

Affordability decreasing.

2.3 Community Aspirations

Council has engaged the community on housing and neighbourhood character matters several times over the past few years, including during preparation of Plan Brimbank (Council's Planning Scheme Review, the 2021–2025 Council Plan, the *Draft Neighbourhood Character Study* in 2019 and the 2022 *Affordable Housing Position Statement*. In addition, Council has recently undertaken preliminary engagement with the community on this project, via the 'Your Say' website and conducted a workshop with Councillors.

Engagement undertaken for the **2019 Draft Neighbourhood Character Study**⁸ resulted in 70 submissions.⁹ The range of issues raised included:¹⁰

- > A desire for more trees in private and public spaces.
- > The impact of increased density on amenity, open space, car parking, community services, private rubbish bins, road layout and traffic including loss of character in RGZ.
- > Concerns over zoning and the impact on neighbourhood character.
- > Greater guidance on design features such as roof forms and colour palettes.
- > Concern about over development including overshadowing.
- > A desire for a two-storey height limit.
- > That character should reflect surrounding suburbs.
- > That character objectives are not necessary.
- > The need for improved maintenance of private and public land.
- > Concerns about increased demand for on-street carparking.
- > The impact of Draft Study on Development Plans for River Valley, City West Water site and final stage of Cairnlea.
- > The need for housing diversity (particularly for aged).
- > Suggested use of quarries for open and recreational space.
- > Greater clarity around how character and heritage are assessed.
- > Greater reference to the H.V. McKay Garden Estate subdivision and potential for standalone character precinct.
- > Greater reference to the Albion Neighbourhood Plan.
- > That the Draft Study facilitates development.
- > How the Draft Study references VCAT decisions.
- > That the draft Study does not consider existing restrictions over the land e.g., covenants.
- > A range of feedback about other matters including comments about Melbourne Airport Rail, development of surplus school sites, management of private shopping centres, contamination etc.

Another round of engagement was undertaken in October/November 2022 to provide an updated snapshot of community concerns. This included two interactive maps on Brimbank City Council's 'Your Say' page—on which community members could pin locations and input comments—and a workshop with Councillors. The interactive maps resulted in 49 comments from 19 respondents.

⁸ Mesh 2019, Draft Brimbank Neighbourhood Character Study, Brimbank City Council.

⁹ These comprised 53 pro forma submissions related to residential land south of Taylors Road, between Arthur Street and Alfreda Street, St Albans, and 16 individual submissions.

¹⁰ Listed verbatim from Council meeting minutes. Brimbank City Council 2020, 12.6 – *Draft Neighbourhood Character Study – Progress Report*, Brimbank Ordinary Council Meeting 23 June 2020, p.609–610.

Key issues, considerations and opportunities from the **preliminary engagement** and the **‘Your Say’ maps** included:

Housing diversity

- > New development should include a variety of housing.
- > New development should include some single storey housing to remain in keeping with the surrounding character.
- > Underutilised land should be developed with higher density forms.
- > Locate higher density housing along main roads and near activity centres.
- > Concern about preserving existing suburbs and streetscapes.
- > Townhouses and units should be built in new areas only.
- > Sunshine is a good location for apartments (followed by Deer Park, Albion, St Albans and Sydenham/Watergardens).

Built form, design and quality

- > Concern about quality of new development.
- > Concern about new development impacting on neighbourhood character and heritage value of areas.
- > New development should be energy efficient and powered by solar energy.

Landscaping

- > Need for additional landscaping and trees, along streets and in parks.
- > Incorporation of trees with identified parking.
- > Incorporation of more native vegetation.

Access and movement

- > Creation of new pedestrian footpaths and connections between suburbs.
- > Bus services should be increased, and cycle paths should be linked.

Car parking and traffic

- > Concern about increased traffic and increased demand for car parking.

The engagement also resulted in positive feedback about neighbourhoods and green areas that residents appreciate and about how Sunshine will be a great suburb to live in in the future.

The Councillor workshops consisted of a hybrid Zoom and in-person session. Key issues, considerations and opportunities from the **Councillor Workshop** included:

Housing diversity

- > Housing types that cater to all ages, life stages, economic circumstances and physical abilities will be needed in the future.
- > Underdevelopment of land should be avoided, consider minimum height limits and/or development targets.

Housing location

- > Close to amenities (e.g., public transport, community facilities, shopping centres).
- > In activity centres.
- > On vacant and underutilised land.
- > Above shopping centre car parks.
- > Potential future railway station east of Calder Park Drive a potential opportunity for increased growth.
- > Avoid creating isolated communities.

Neighbourhood character

- > Space around buildings should be retained.
- > Opportunities for greening, including in existing developments, new developments, on roof tops and in nature strips.
- > Albion's neighbourhood character should be protected.
- > Design guidance for medium and high density areas should be improved.
- > Should consider modal shift and sustainability.
- > There are a lot of issues related to parking—lack of sufficient visitor parking, car dependency leading to demand for parking, on-street parking that takes away space for trees, developments designed around provision of parking (e.g., with driveways and garages).

Common themes between the rounds of consultation in 2019 and 2022 are that residents:

- > Desire housing diversity located near activity centres and main roads, where it will not impact too much on the character and heritage of established neighbourhoods.
- > Support higher density (than the current neighbourhood's density) in these same areas, but only if it well designed and of high quality.
- > Would like additional landscaping through the municipality.
- > Would like increased connection between areas, both visually (i.e., through attention to fencing and interfaces) and physically (i.e., through pedestrian paths and cycle paths).
- > Are concerned about preservation of adequate on-site parking throughout the municipality.

2.4 Role of Council

Brimbank City Council will play an important leadership role in understanding and capturing the community's housing needs and providing strategic direction to guide the required future mix, location and design of housing.

However, housing is a broad and complex issue influenced by a range of interrelated factors, with an important factor being the market. Regardless, Council must be deliberate in the role it elects to play. Key areas where Council plays an important role in housing are:

- > **Monitoring** – Collecting relevant information to understand the housing market, how it is changing, and the needs of the community.
- > **Planning and Policy** – Updating the Planning Policy Framework (PPF) and zones and overlays to respond to housing needs and priorities and provide strategic direction to achieve desired outcomes. This includes planning for an adequate supply of housing, identifying the preferred location for different types of housing and guiding the way housing is designed.
- > **Advocacy and partnerships** – Working proactively with the State and Federal Governments, agencies and the development industry to promote desired housing outcomes and the provision of infrastructure and services to support housing.

This Project focusses primarily on the planning and policy role, building on recent monitoring work undertaken by Urban Enterprise.¹¹ While matters may arise that will be relevant to Council's advocacy and partnerships and capacity building roles, these are not the primary focus of the Project.

2.5 Summary of Findings

- > Brimbank is experiencing rapid growth as a result of its locational attributes as a middle-ring municipality, current and future government investment in key infrastructure projects and its attractiveness to overseas migrants.
- > The community aspires to retain Brimbank's heritage, character, and relative affordability as part of its growth, and to meet the housing needs of an ageing and diverse population.
- > Council has a range of important roles to play when it comes to housing. The key focus of this Project is on planning and policy responses to housing and neighbourhood character.

¹¹ Urban Enterprise 2021 (updated 2022), *Brimbank Housing Strategy: Background Analysis*, Brimbank City Council.

3. POLICY CONTEXT

The government policy landscape shapes how Council plans for housing and neighbourhood character. In Australia, housing policy is primarily the responsibility of the State, with obligations placed on local government. Federal government policy has an important, but less direct, impact on how Council plans for housing growth and change. Neighbourhood character policy is the responsibility of local government, at the direction of the State Government.

3.1 Federal

The Commonwealth's role in shaping housing is generally restricted to taxes and housing market interventions. The Department of Social Services seeks to set policy to improve housing affordability and the provision of social housing and to address and prevent homelessness.¹² Implementation strategies include funding agreements between the Commonwealth and states and territories to respond to their housing and homelessness crises and development of the National Housing and Homelessness Agreement (NHHA) and National Rental Affordability Scheme (NRAS).

National Housing and Homelessness Agreement (Department of Social Services, 2018)

[The NHHA](#) provides Commonwealth funding to State and Territory Governments to improve access to affordable, safe and sustainable housing. An estimated \$2 billion has been allocated to Victoria over the course of five years (2018–2022), with approximately \$413 million injected in 2020–21 to support Victoria's homelessness and social housing goals as per the State Government's *Homes for Victorians* policy framework (see *Homes for Victorians* in section 3.2 below).

National Housing and Homelessness Plan (Department of Social Services, under development)

The Australian Government is currently developing a National Housing and Homelessness Plan. This will be a 10-year strategy that sets out a vision for future housing and homelessness policy in order to help more Australians access safe and affordable housing. Stakeholder engagement for the plan will be conducted in the second quarter of 2023.

National Rental Affordability Scheme (Department of Social Services, 2008–2026)

In conjunction with State and Territory Governments, [the NRAS](#) seeks to respond to a lack of affordable housing across Australia by providing financial incentives to developers. Financial incentives apply only to newly constructed dwellings, with the intention of:

- > Increasing the supply of affordable rental housing.
- > Reducing rental costs for low to moderate income households.
- > Encouraging the large scale investment and innovative delivery of affordable rental housing.

Allocation of affordable housing is means tested, providing affordable housing only to those most at risk of rental stress, such as low to moderate income earners.

The 2022–23 Federal Budget (Australian Government, 2022–23)

[The 2022–23 Federal Budget](#) seeks to implement a comprehensive housing reform agenda, which includes bringing all levels of government together with the housing industry under a new Housing Accord. The Housing Accord sets an initial aspirational target of delivering one million new, well-located homes over five years. It includes funding commitments to invest in new social housing and assist home buyers, the establishment of a National Housing Supply and Affordability Council as an advisory body to the Commonwealth on housing policy, and

¹² Outcome 4 of the department's Corporate Plan 2022–23.

commitments from State Government to undertake expedited zoning, planning and land release to deliver affordable housing opportunities.

Other Initiatives

Efforts to increase home ownership are facilitated through measures such as the [National Housing Finance and Investment Corporation \(NHFIC\)](#), which provides first time home buyers with concessional loans and home starter grants to ease entry into the housing market.

Australia's social welfare system also provides relief from rental stress through rent assistance, through which the renter is a recipient of a Centrelink payment.

3.2 State

Housing policy and planning for growth rests primarily with the State. In Victoria, broad policy objectives align with those of the Commonwealth. These include objectives to improve access to home ownership, to increase the supply of social and affordable housing and to reduce rental stress. State policy provides guidance to local governments on planning for housing, accommodating projected needs and ensuring that housing is affordable and that neighbourhoods are liveable.

State Government also provides policy direction to local governments on planning for neighbourhood character. Further, the State Government prepares land use plans and policy that guides housing growth and, to a lesser extent, character.¹³

Plan Melbourne 2017–2050 (Victoria State Government, 2017)

[Plan Melbourne](#) provides the blueprint for the future of metropolitan Melbourne, setting the vision and policy direction for the growth of Melbourne to a projected population of 8 million people in 2050.

Outcome 2 of *Plan Melbourne*—‘Melbourne provides housing choice in locations close to jobs and service’—is most relevant to the Project and is to be achieved via the following key policy directions:

- > Focus the delivery of new housing in established suburbs close to existing services, jobs and public transport.
- > Provide certainty about the scale of growth in the suburbs.
- > Incorporate mixed use development with housing in urban renewal precincts and activity centres.
- > Increase the supply of social and affordable housing.

A key aspect of this outcome is achieving a 70/30 split for housing growth—meaning that 70 percent of all new housing is to be built in established areas, with the remaining 30 percent of housing built in greenfield areas. This 70/30 ratio will help manage housing supply, consolidate Melbourne’s growth and limit urban sprawl, ensuring that Melbourne remains liveable.

Established areas such as Brimbank are expected to accommodate a significant amount housing growth. *Plan Melbourne* seeks to direct development of diverse, higher density housing through application of the 20-minute neighbourhood framework (Figure 6). The idea behind this framework is that everyone will be able to meet their daily needs within a 20-minute walk (round trip) from home.

¹³ An example of this is DTP’s planning for Sunshine Priority Precinct.

Figure 6: 20-minute neighbourhood framework (Source: Plan Melbourne 2017–2050)



Figure 7: Hallmarks of 20-minute neighbourhoods (Source: State Government of Victoria, DELWP website)



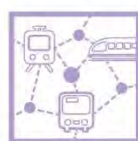
Hallmark 1:
Safe, accessible and well connected for pedestrians and cyclists to optimise active transport



Hallmark 2:
High-quality public realm and open spaces



Hallmark 3:
Provide Services and destinations that support local living



Hallmark 4:
Facilitate access to quality public transport that connects people to jobs and higher order services



Hallmark 5:
Deliver housing/population at densities that make local services and transport viable



Hallmark 6:
Facilitate thriving local economies

Plan Melbourne identifies Sunshine as an MeAC and the Sunshine/St Albans area as an NEIC supporting significant development and investment in the suburb.

The Sunshine NEIC, and in part the SHWEP, is expected to build a critical mass of tertiary education, health-related training, health care, and retail and professional services, by building on existing uses such as the Victoria University Sunshine and St Albans campuses, the Sunshine and Western Centres for Health Research and Education, the Sunshine and St Alban's Activity Centres, and nearby industrial areas. Investment in the Metro

Tunnel, level crossing removals, regional train services and the airport rail will further enhance the connectivity and activation of this cluster.

Within *Plan Melbourne*, neighbourhood character is viewed in two ways. In one sense, the character of a neighbourhood is something ultimately created by residents and will change over time. Planning's role is to support the growth of sustainable, high amenity communities that enable a preferred character to flourish. In another sense, neighbourhood character is the distinctiveness of an area's public realm and built form. This includes things such as its prevailing architectural styles, patterns of development, open spaces and landscaping, and distinct heritage buildings. *Plan Melbourne* notes how protecting and evolving this type of neighbourhood character has been addressed by recent reforms to residential zones (discussed further below).

Western Metro Land Use Framework Plan (Victoria State Government, 2017)

The [Western Metro Land Use Framework Plan](#) was developed to guide the application of *Plan Melbourne* for six western local government areas: Brimbank, Hobsons Bay, Maribyrnong, Melton, Moonee Valley and Wyndham. It sets a 30-year strategy for population and industry growth, service and infrastructure development, public and private investment, the preservation of distinct and historic characteristics of the region and environmental resilience.

Victoria in Future 2019 (DELWP, 2019)

[Victoria in Future \(VIF\)](#) is the official State Government projection of population and households. Projections are based on trends and assumptions for births, life expectancy, migration and living arrangements across all of Victoria.

VIF 2019 showed that Victoria has been growing at a faster rate than planned for in *Plan Melbourne*. However, these projections have not yet been updated to reflect changes to populations since the Covid-19 pandemic.

State policy directs that Councils base their housing strategies on these population projections. These have been a key input of the background population and demographic analysis of this Project.

Homes for Victorians (Victoria State Government, 2017)

In response to projected population growth, [Homes for Victorians](#) provides a coordinated set of initiatives specific to the delivery of housing throughout the state.

The key initiative relevant to this Project is Initiative 2 – 'Increasing the supply of housing through faster planning approvals. This initiative provides the framework for reform to residential zones, targeting greater housing development in key areas such as activity centres and increasing the supply of affordable housing.

Big Housing Build (Victoria State Government, 2020)

The [Big Housing Build](#) is a Victorian Government program that seeks to boost the supply of social housing by 10 percent in four years (to 2024). As of November 2022, the Big Housing Build has delivered 20 homes in Brimbank—with another 248 underway—across 21 projects.

10-Year Strategy for Social and Affordable Housing + Discussion Paper (Homes Victoria, 2021)

In early 2021, the State Government ran a consultation program to seek input on development of a [10-Year Strategy for Social and Affordable Housing](#) that would achieve a step change in the social and affordable housing landscape. The [Discussion Paper](#) outlined a vision for all Victorians to have access to safe, affordable and appropriate housing and set out four principles for the strategy:

- > **People at the centre** – Housing that is responsive to the needs of different people.
- > **Shared action and accountability** – Government, service providers, private businesses and community working together to achieve the vision.
- > **Maximising value** – Strategies that are informed by data and evidence, to deliver the best outcomes and value.

- > **Sustainability** – Government and community housing sectors have the capacity to scale up efficiently to deliver growth, and housing incorporates best practice sustainable design.

The Strategy is expected to be released in the coming months.

Planning Policy Framework (State and Regional Provisions)

The PPF is the policy content of the planning scheme. It provides state, regional and local context¹⁴ for spatial planning and decision-making by planning and responsible authorities.

The State and regional provisions set out Brimbank City Council's obligations as planning authority in relation to planning for population growth and managing housing change. The clauses and policy directions most relevant to the **Housing Strategy** are as follows:

- > Clause 11.01-1S *Settlement* – Seeks the development of compact, sustainable communities that offer convenient access to jobs, services infrastructure and community facilities, preferencing urban renewal and infill development over urban sprawl.
- > Clause 11.01-1R *Settlement* – Metropolitan Melbourne requires metropolitan councils to plan in accordance with *Plan Melbourne*, which seeks to facilitate major growth and change in major employment, health, and education precincts and activity centres beyond the central city to meet the needs of Melbourne's rapidly growing population. Sunshine is identified in the Melbourne 2050 spatial framework as an MeAC and NEIC, supported by transport infrastructure improvements.
- > Clause 11.02-1S *Supply of urban land* – Requires planning authorities to ensure there is sufficient supply of land available for residential (and other) uses for at least a 15 year period, having regard to a range of considerations, including opportunities to consolidate existing urban areas, neighbourhood character and any constraints or limitations on development or infrastructure.
- > Clause 13.07-1S *Land use compatibility* and Clause 13.07-2S *Major hazard facilities* – While not explicitly related to housing, these are relevant to the siting and intensification of housing, as they require separation from sensitive uses to manage risk and adverse off-site impacts.
- > Clause 16.01-1S *Housing supply* – Seeks to facilitate quality housing that is located appropriately, at the quantity needed, with the diversity that meets community needs and at higher densities near jobs, services and public transport.
- > Clause 16.01-2S *Housing affordability* – Aims to deliver affordable housing in close proximity to employment, transportation and services and to ensure that social and public housing meets community needs.
- > Clause 16.01-4S *Community care accommodation* – Seeks to facilitate the establishment of this accommodation, keeping location confidential.
- > Clause 16.01-5S *Residential aged care facilities* – Recognises that this type of accommodation contributes to housing diversity and choice and is appropriate in residential areas. The policy facilitates the development of well-designed and appropriately located residential aged care and requires housing strategies to provide for these facilities to enable older people to live in appropriate housing in their local community.¹⁵
- > Clause 18.02-7S *Airports and airfields* – Seeks to protect airports and airfields from incompatible development and to minimise the detrimental effects of aircraft noise on surrounding areas.
- > Clause 18.02-7R *Melbourne Airport* – Protects the operations of Melbourne Airport and ensures new use or development does not affect its optimal operation and use.

The following State policy directions are most relevant to the **Neighbourhood Character Strategy**:

- > Clause 15.01 *Built Environment* – Focuses on minimising adverse impacts on existing built form and ensuring that new development positively contributes to living and working environments.

¹⁴ The new format PPF integrates all three levels of policy. At present, some planning schemes are still in the process of being translated to the new format.

¹⁵ However, this policy does not address locational need and preferences for residential aged care facilities.

- Related specifically to neighbourhood character, Clause 15.01-5S contains strategies to:
 - *Support development that respects the existing neighbourhood character or contributes to a preferred neighbourhood character.*
 - *Ensure the preferred neighbourhood character is consistent with medium and higher density housing outcomes in areas identified for increased housing.*
 - *Ensure development responds to its context and reinforces a sense of place and the valued features and characteristics of the local environment and place by respecting the:*
 - *Pattern of local urban structure and subdivision.*
 - *Underlying natural landscape character and significant vegetation.*
 - *Neighbourhood character values and built form that reflect community identity.*
- This clause is key to establishing the role of existing and preferred neighbourhood character statements in decision making.
- > Clause 15.03 *Heritage* – Ensures the conservation of places of historical significance. It provides for retaining important heritage elements and encourages new development that aligns with heritage values.

Residential Zone Reforms

In 2017, a review by State Government resulted in reforms to the existing suite of residential zones. The zones relevant to Brimbank include the GRZ, NRZ and the RGZ. The reforms include the following:

- > Allowance for design and neighbourhood character outcomes to be specified within a schedule.
- > Strengthened building height controls in the NRZ and the GRZ.
- > Introduction of a mandatory minimum garden area requirement in the NRZ and GRZ.
- > Removal of the dwelling per lot cap in the NRZ.

In 2018, following feedback from local government and industry, the zones were further refined to clarify matters relating to the minimum garden area requirements in the NRZ and GRZ.

In 2019, PPN90 – *Planning for housing* and PPN91 – *Using the residential zones* were released (refer below for further details). These established a new integrated approach to planning for housing and neighbourhood character and provided greater clarity on the use of residential zones to direct preferred housing outcomes.

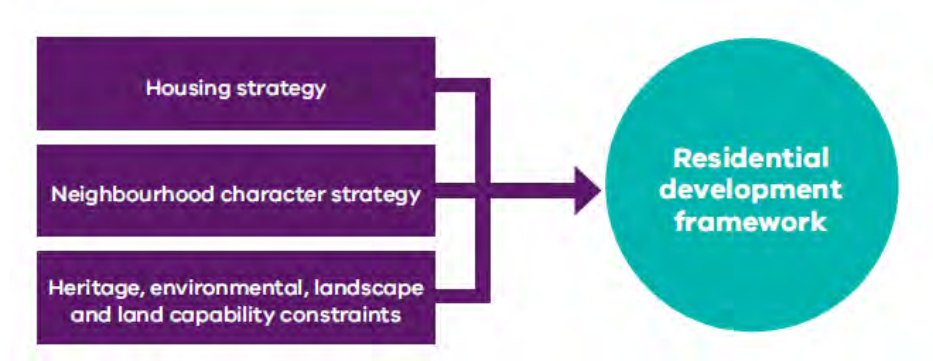
Brimbank's residential zones were implemented in 2014 (strategically justified by Brimbank's Housing Strategy, *Home and Housed*). The schedules were then intended to be further updated following the 2017 changes (with strategic justification provided by a draft Neighbourhood Character Study). This work was commenced in 2018 but was then halted following consultation on the draft Study due to the release of the PPNs in 2019. It is now being revised and finalised as part of this Project.

Planning Practice Notes 90 and 91 (DELWP, 2019)

PPNs give technical advice about the planning system. As mentioned above, in 2019 two significant new PPNs were released that directly shape this Project.

PPN90 – *Planning for housing* provides guidance on how to plan for and balance housing growth and protection of neighbourhood character through preparation of an RDF. This framework requires holistic strategic planning in the form of a Housing Strategy, a Neighbourhood Character Strategy, and analysis of heritage, environmental, landscape and land capability constraints to bring all issues together into a coherent strategic vision that balances competing objectives.

Figure 8: Inputs for an RDF (Source: PPN90)



A key action associated with an RDF is identifying areas of minimal, incremental and substantial change, using the existing built form as a starting point. Identification of levels of change serves as a way to balance competing objectives and provides the community with more certainty about future growth.

Figure 9: RDF levels of housing change (Source: PPN90)



PPN91 – *Using the residential zones* provides guidance on how to use the new residential zones from the 2017 and 2018 reforms, how to make use of key features of the schedules and how to support their use with local policies and overlays. It explains that Councils can work toward preferred neighbourhood character through preferred neighbourhood character statements in local policy and objectives specified in schedules to residential zones, noting that Councils should consider whether it is necessary to have both.

One of the key differences in how to use zones (in contrast to how zones were previously defined by State Government, and in turn, used by Brimbank in *Home and Housed* – see below) relates to the alignment of residential zones with housing change areas. PPN91 makes it clear that all residential zones should support and allow for increased housing unless there are special attributes or physical constraints. However, some zones are more appropriate than others for different levels of change. As such, zone selection should be based on the development capacity of the land. For Brimbank, constraints that may limit housing growth are outlined in the Housing Influences chapter of this Background Report.

Figure 10: Aligning housing change areas and the residential zones (Source: PPN91)

Zone	Special or constrained	Minimal	Incremental	Substantial
Low Density Residential Zone	✓	✓		
Mixed Use Zone			✓	✓
Township Zone		✓	✓	
Residential Growth Zone			✓	✓
General Residential Zone			✓	✓
Neighbourhood Residential Zone	✓	✓	✓	

A new feature of the 2017/2018 residential zones was the introduction of maximum heights for each zone. These heights will be a key factor when determining growth capacity and can be used in conjunction with applying local requirements (i.e., design/neighbourhood character objectives and/or variations to Clause 54 and 55 standards – see below) to achieve preferred built form outcomes. For Brimbank, these outcomes will be identified in the future Neighbourhood Character Strategy, based on analysis outlined in the Neighbourhood Character Influences chapter.

The Residential Development Influences chapter provides more detailed guidance on how the residential zones and their schedules can be implemented to achieve Brimbank City Council's strategic vision for housing and neighbourhood character.

Clause 54 and Clause 55

Clauses 54 and 55 are often collectively referred to as the Residential Code (ResCode). These clauses set objectives and standards for residential development for one dwelling on a lot (Clause 54) and two or more dwellings on a lot (Clause 55).

The purpose of these clauses is to ensure residential development respects existing neighbourhood character or contributes to a preferred neighbourhood character, provides a reasonable standard of amenity for existing and new residents, and is responsive to the site and neighbourhood.

Some standards contained in ResCode can be varied by the implementation of specific schedules in the residential zones. In Brimbank, schedules have been used to vary ResCode Standards. These variations are discussed in Section 3.3.

These variations are applicable whether a planning permit is required for the residential development or not. Where permits are not triggered, the variations are implemented via the Building Regulations.

DTP is currently reviewing ResCode as part of its ongoing process to improve and streamline the planning system. A [Discussion Paper](#)¹⁶ has been released that sets out an updated format of the ResCode standards to be clearer about their expectations and to be better aligned with the principles of the Victorian Planning Provisions. The expectation is that this new model will lead to more certain and more efficient development assessment and decision making. Any changes made to ResCode are not expected to impact on this Project, as changes will be made to the format only, and not the content of the ResCode standards.

¹⁶ DELWP 2021, *Improving the operation of ResCode: A new model for assessment*, DELWP website, accessed 13 February 2023, <https://engage.vic.gov.au/improving-operation-rescode>.

3.3 Local

Existing local policy also influences housing and neighbourhood character in Brimbank. As some of this policy is now out of date because of changes to State policy direction, the directions highlighted here are subject to change as a result of this Project.¹⁷

Local Planning Policy Framework

At the time of writing, the Brimbank Planning Scheme still reflects the old format (with a State PPF and Local PPF). However, Planning Scheme Amendment c225brim proposes to update the Scheme by translating existing local policy from the LPPF into the new integrated Municipal Planning Strategy (MPS) and PPF in accordance with the structure introduced by Amendment VC148. It also seeks to incorporate new local policy content as identified as part of a review of the Planning Scheme, audit of adopted policies, strategies and plans, and community consultation.

Amendment c225brim was submitted to the Minister for approval on 2 November 2022. Council is still awaiting a decision.

¹⁷ These have been identified where applicable.

Current LPPF

The Municipal Strategic Statement identifies an increasing demand for housing, to meet the needs of an ageing population and to accommodate smaller household sizes (Clause 21.02). This housing, as envisaged by the strategic land use vision (Clause 21.04), is to be in the form of well-designed, high quality and sustainable development that contributes to the desired neighbourhood character and respects heritage and landform. Increased residential densities are to be in and around activity centres.

The following policies relate primarily to **housing**:

- > Clause 21.07-1 *Residential Growth* directs resident growth to appropriate locations, with lower density housing directed to the NRZ, increased densities in the GRZ and higher densities in the RGZ (21.07-1). The effectiveness of these zones is discussed in the Housing Influences section).
- > Clause 21.07-2 *Housing Diversity* encourages diverse housing, including adaptable, affordable and student housing. The demands for this type of housing are growing (refer to Housing Influences section). Background analysis done for the Strategy¹⁸ revealed that 80% of new dwelling growth in Brimbank is separate houses, and 14% is semi-detached and townhouses, suggesting that diversity needs are not currently being met.
- > Clause 21.07-3 *Residential design* seeks new development that demonstrates best practice ESD and is supported by local policy at Clauses 21.06-5 and 22.02, which requires multi-unit residential development to demonstrate ESD performance as an application requirement. This policy has been removed from the new PPF, however, the ESD performance of housing remains a concern in Brimbank (refer to Housing Influences section).
- > Clause 21.08-1 *Activity Centres* – encourages higher density residential housing in activity centres that are serviced by the principal public transport network. This policy is currently being supported by strategic work for the Sunshine MeAC (refer to the Sunshine Policy Context below). The Housing Influences section identifies those major residential developments (including those incorporating apartments, are emerging in and around activity centres. Sunshine, Sydenham and St Albans activity centres are also identified as having substantial capacity to accommodate more apartment development; however, this is unlikely to occur until land values increase, migration rates normalise and major public sector investment progresses.¹⁹
- > Clause 21.09-1 *Industrial Precincts* identifies the value of Brimbank's industrial land and seeks to manage conflict between industry and sensitive land uses through buffers and the considered location of new residential development. Understanding the potential conflicts between residential development and industrial uses is a complex issue, with buffers difficult to define. This is discussed in further detail in the Housing Influences section.
- > Clause 21.10-4 *Infrastructure* – Seeks to ensure new development is well serviced and protected from flooding. Strategies seek to encourage new development to incorporate on-site stormwater treatments and maximise permeable surfaces. This policy tends to be addressed on a case-by-case basis, usually on larger developments as is more challenging to achieve on-site treatment on smaller developments. In addition, Clause 55 provisions (and variations) relating to site coverage and permeability tend to take precedence in assessment of housing.

The following policies relate primarily to **neighbourhood character**:

- > Clause 21.07-3 *Residential design* – Promotes well designed, innovative and responsive development (21.07-3), that respect neighbourhood character and reflects the objectives in character studies and design guidelines adopted by Council. No such studies or guidelines have been adopted, which creates a substantial policy gap for decision-makers (refer to Neighbourhood Character Influences section).
- > Clause 21.06-1 *Heritage* – Seeks to ensure new development is sympathetic to the character of surrounding buildings and places and discourages 'mock' heritage design. Heritage Overlays (HO) have been applied and are potential constraints for housing growth (refer to Housing Influences section) and influence neighbourhood character in some areas (refer to Neighbourhood Character Influences).

¹⁸ Urban Enterprise 2021 (updated 2022), *Brimbank Housing Strategy: Background Analysis*, Brimbank City Council.

¹⁹ Ibid.

- > Clause 21-06-7 *Non-residential uses in residential areas* – Seeks to protect the amenity of residential areas from the impacts (such as those caused by car and bicycle parking, hours of operation, landscaping and building design and location) of non-residential uses. The emerging threats to neighbourhood character of these uses are discussed in the Neighbourhood Character Influences section.
- > Clause 21.06-3 *Escarpments and ridgelines* – Seeks to ensure that development along ridgelines and waterways is set back and designed to respect the natural features, including requirements for muted colours and use of natural landscape materials. This policy is supported by use of overlays to guide design outcomes, which is discussed in more detail in the Neighbourhood Character Influences section.

Proposed new format PPF

The local provisions of the proposed PPF set a vision for a liveable community where the urban environment supports a growing population in designated areas while respecting neighbourhood character and heritage, and a prosperous community where housing is of high quality, well located and relatively affordable (Clause 02.02).

Increased housing densities are directed to and around activity centres, and diverse and affordable housing types are encouraged (Clause 23.03-5). Innovative built form, configurations and design is encouraged in change areas, high amenity neighbourhoods are facilitated, and development is managed in heritage areas (Clause 02.03-4).

In the new format PPF, local policy must not duplicate state policy, and as such, the proposed PPF only specifies local provisions that extend state policy to a local context. These policies may be amended as part of the Project.

The following policies will primarily influence planning for **housing** in Brimbank.

- > Clauses 11.03-1L-01 to Clause 11.03-1L-04 *Activity centres* – Focus on guiding commercial and retail development in activity centres at a range of scales. The policy supports residential development where it complements the commercial use and character of the centre, including above ground floor level, and the provision of appropriate transitions of built form at the edge of centres. Sunshine is identified as an MeAC, Deer Park and Sydenham are identified as major activity centres.
- > Clause 13.05-1L *Noise abatement* – Requires noise attenuation for residential development in areas where amenity may be compromised, including the Calder Park Raceway, parts of activity centres close to loading areas and along the Melbourne Airport Rail.
- > Clause 15.02-1L-01 *Energy and Resource Efficiency* and Clause 15.02-1L-02 *Environmentally Sustainable Development* – Promotes dwelling orientations and roof designs that benefit the use of rooftop solar as a primary energy source, and triggers sustainable design assessments for multi-unit developments.
- > Clause 16.01-1L *Housing supply* – Designates preferred areas for student housing surrounding Victoria University and the University of Melbourne campuses at Sunshine and St Albans, and increased housing provision and diversity of housing (including housing with diverse bedroom numbers in multi-unit developments) in and around the activity centres of Sunshine, St Albans, Sydenham, Deer Park and Keilor Downs, where transport, services and facilities make development feasible. In keeping with heritage considerations, the clause encourages new development to the rear of existing dwellings in heritage significant areas. This clause references *Home and Housed*, and as such, is likely to be reviewed as part of this Project.
- > Clause 16.01-2L *Housing affordability* – Encourages affordable housing in large scale residential developments and partnerships with Registered Housing Associations. No guidance is provided on preferred locations for affordable housing, which this Project will address.
- > Clause 16.01-5L *Residential aged care* – Seeks to ensure that facilities are designed for safety, security and maximum amenity and that they have adequate open space. While strong demand exists for this type of development to meet the needs of an ageing community, the impact on neighbourhood character will need to be balanced.

The following policies will primarily influence **neighbourhood character**:

- > Clause 12.03-1L *River corridors, lakes and wetlands* – Similar to the LPPF, seeks to ensure that development along ridgelines and waterways is set back and designed to respect the natural features, including requirements for muted colours and use of natural landscape materials.
- > Clause 15.01-1L *Urban design* and Clause 15.01-2L *Building design* – Seek streetscape views free of service utilities (including electricity lines), durable and weather resistant materials and frontages that prioritise activation. Most requirements are general ‘good design’ expectations and could be strengthened and made more spatially specific.
- > Clause 15.01-5L *Neighbourhood Character* – Is sourced from *Home and Housed*, and reinforces ResCode variations in residential zones, including requirements for open space and tree plantings. It seeks to minimise vehicle crossings and impacts on street trees. It is notable that in the translation process, Clause 21.07-3 *Residential Design* (in the old format LPPF), has been substantially reconfigured in Clause 15 to remove ambiguity about the application of design requirements across different zones. The relevance of specific design strategies (particularly those that require integration with surrounding environment and respect for neighbourhood character) has been clarified to apply only to developments that require an assessment against neighbourhood character (i.e., it does not apply to development in areas of substantial change, such as RGZs, where a preferred character is more relevant than existing neighbourhood character. This policy will be reviewed as part of this Project.
- > Clause 15.03-1L *Heritage Conservation* – Applies to land affected by the Heritage Overlay (HO) and provides guidance on demolition and alteration of individual and contributory heritage buildings. Alterations and additions to contributory buildings must not detract from the building’s heritage significance and, regarding non-contributory buildings, alterations and additions must be visually recessive from the streetscape.

Zones and Overlays

Zones and overlays are used to implement planning policy objectives. Zone schedules are used to achieve local planning policy objectives. The residential zones and their purposes are set out in Table 2, with key words bolded to emphasise the differences between the zones.

Table 1 Residential Zones

Zone	Purpose relevant to housing + neighbourhood character
RGZ	<p>To provide housing at increased densities in buildings up to and including four storey buildings.</p> <p>To encourage a diversity of housing types in locations offering good access to services and transport including activity centres and town centres.</p> <p>To encourage a scale of development that provides a transition between areas of more intensive use and development and other residential areas.</p> <p>To ensure residential development achieves design objectives specified in a schedule to this zone.</p>
GRZ	<p>To encourage development that respects the neighbourhood character of the area.</p> <p>To encourage a diversity of housing types and housing growth particularly in locations offering good access to services and transport.</p>
NRZ	<p>To recognise areas of predominantly single and double storey residential development.</p> <p>To manage and ensure that development respects the identified neighbourhood character, heritage, environmental or landscape characteristics.</p>
MUZ	<p>To provide for a range of residential, commercial, industrial and other uses which complement the mixed-use function of the locality.</p> <p>To provide for housing at higher densities.</p> <p>To encourage development that responds to the existing or preferred neighbourhood character of the area.</p>

Residential Zones have been applied in accordance with *Home and Housed*, before the release of PPN90, and as such their application does not align with current planning direction.

A summary of zones used in Brimbank and commentary on their relevance to housing is provided in Appendix 7.1. In summary, the key findings are:

- > The NRZ is applied to areas intended for Limited Change and the GRZ is applied to areas intended to accommodate Incremental Change, however, the NRZ is accommodating incremental change at a similar rate to the GRZ (39% and 37% respectively²⁰). The reforms to the NRZ and GRZ as will be a consideration for this Project, particularly how these zones are now used primarily to direct height, rather than extent of change (refer Neighbourhood Character Influences section).
- > The RGZ is intended to accommodate Substantial Change. Analysis shows that growth is not being achieved at a meaningful rate in the RGZ due to a combination of factors, including market conditions (refer to Housing Influences section) and policy conflicts regarding neighbourhood character (refer to Neighbourhood Character Influences section). In this context, the immediate concern for the Project, as the apartment market matures, relates to ensuring the RGZ land is not subject to *underdevelopment*.
- > The Mixed Use Zone (MUZ) is a residential zone not implemented by *Home and Housed*, but used in isolated locations across the municipality where there is an existing mixture of uses or to redevelopment by development sites (refer to Appendix 7.3 for summary). While not the focus of this Project, the Housing Strategy will consider the capacity and potential of these site.
- > Schedules to the Residential Zones are used to set ResCode variations. Some conflicts are noted between the Substantial Change expectations of the zone and policy to protect neighbourhood character. These are summarised in Appendix 7.2 and their impact on neighbourhood character and development outcomes is discussed in the Neighbourhood Character Influences chapter.
- > Some areas of RGZ are affected by the HO (near the Sunshine and St Albans activity centres), which creates conflict between expectations for housing change, and protection of heritage values.

Overlays are used for a range of purposes that are relevant to housing and character. They are used in Brimbank to provide further design or development direction and play a significant role in directing the housing and character outcomes of these areas (where they apply to areas that include or are proposed to include housing). For example, the Design and Development Overlay (DDO) and the Development Plan Overlay (DPO) are used to provide guidance in activity centres, at interfaces with the freeway or waterways, or to require certain design outcomes on specific sites. These are discussed in detail in the Neighbourhood Character Influences section.

Other overlays are used to identify constraints to development such as the Land Subject to Inundation Overlay (LSIO), Special Building Overlay (SBO), and the HO. These overlays may influence where we can direct housing growth and are discussed in the Housing Influences section. The Significant Landscape Overlay (SLO) and the Environmental Significance Overlay (ESO) do not directly affect large areas of residential zoned land, but development abutting these overlays may need to have regard to the significance of the features subject to the overlay. For example, overlays applying to river and creek corridors seek protection of views from visually intrusive development.

A summary of the overlays that influence housing and neighbourhood character is provided in Appendix 7.4.

²⁰ Urban Enterprise 2021 (updated 2022), *Brimbank Housing Strategy: Background Analysis*, Brimbank City Council.

Figure 11: Zones in Brimbank (relevant to housing and neighbourhood character)

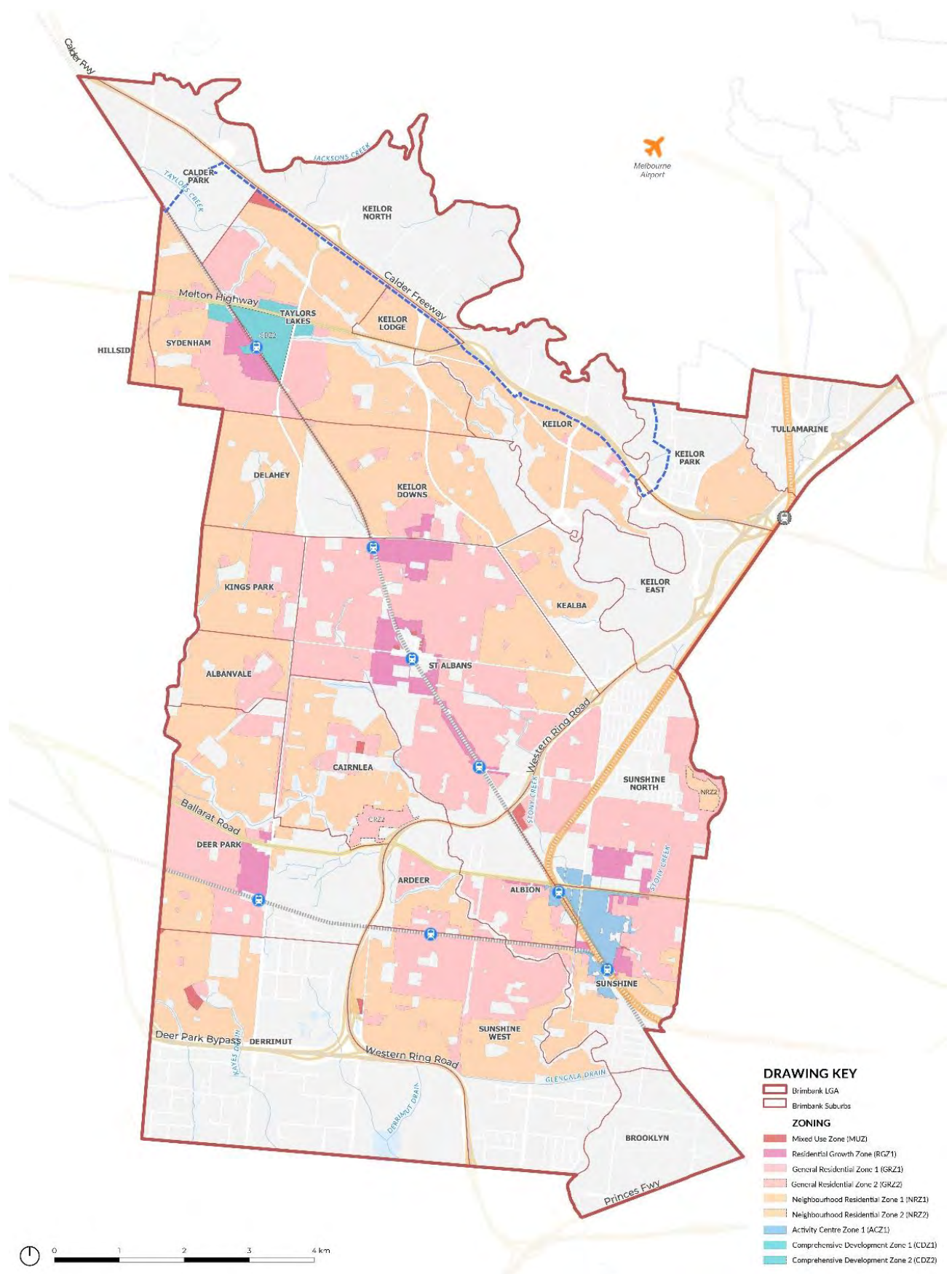
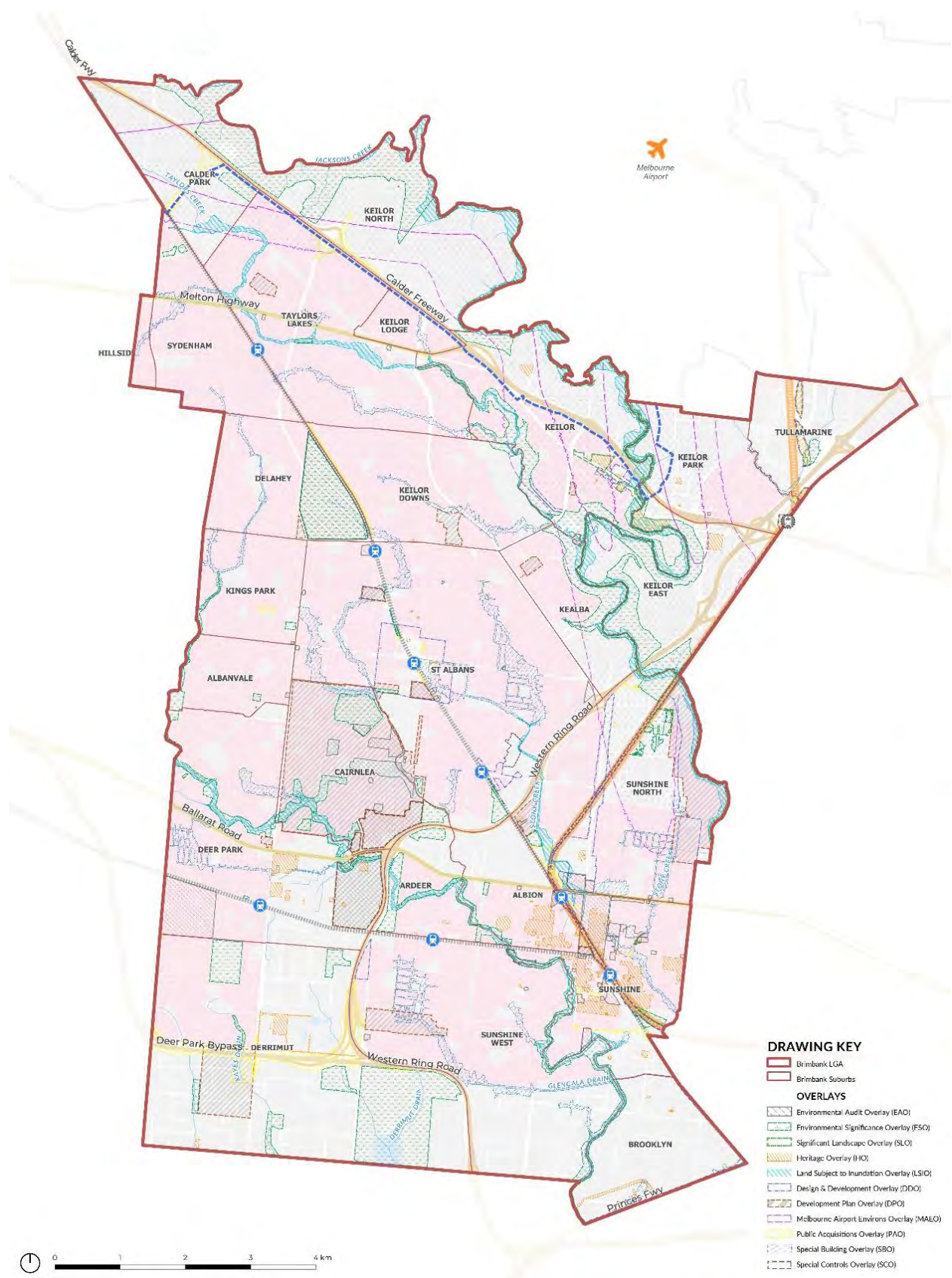


Figure 12: Overlays in Brimbank (relevant to housing and neighbourhood character)



Home and Housed: The Brimbank Housing Strategy (Brimbank City Council, 2014)

Overview of Strategy

Brimbank City Council's current Housing Strategy, [Home and Housed](#), provides the strategic basis for the suite of residential zones and the existing RDF.²¹ It emphasises the importance of location, good design, housing diversity and neighbourhood infrastructure and sets a vision for:

- > **A place to live** – Accommodating growth by determining the location of new housing in Brimbank.
- > **A home for everybody** – Meeting the housing needs of different people in the Brimbank community.
- > **Liveable neighbourhoods** – Protecting Brimbank's existing suburbs and ensuring supporting infrastructure, including green open space, is provided.

To achieve this vision, the Strategy identified areas of limited change, incremental change and substantial change using a multi-criteria assessment considering proximity to the nearest attractor (e.g., a train station, activity centre, community facility), development capacity (e.g., covenants, overlays, building age and condition), land suitability (e.g., slope, drainage, tree coverage), lot size, existing density and land ownership patterns, which were implemented through application of the different residential zones (refer to Table 1) and identification and rezoning of strategic development sites.

Many of the *Home and Housed* considerations remain relevant today but require review in the context of new State Planning Policy (such as Plan Melbourne) and planning direction (such as PPN90). For example, covenants, which affect parts of Brimbank, are no longer considered a constraint on planning for growth pursuant to PPN90. Opportunities and constraints for housing growth have been identified in the Housing Influences section. These will be carefully balanced to set growth, density and diversity directions in the Housing Strategy and the RDF.

Home and Housed also set strategic actions, many of which have been implemented through planning policy and variations to residential zone schedules, relating to affordable housing supply, adaptable, high quality and sustainable housing design, carparking and measures to protect neighbourhood amenity and character (although a detailed neighbourhood character study was not undertaken). This Project furthers these initiatives, to include a more detailed analysis of diverse housing needs (refer to Housing Influences section and the Urban Enterprise Background Report) and neighbourhood character (refer to Neighbourhood Character Influences section) to support future policies and actions in these areas.

Table 2 Home and Housed change areas (Source: Adapted from Home and Housed, 2014)

Change areas	Strategic rationale	Residential Zone applied
Limited change	In areas with limited access to services and facilities, including public transport.	NRZ
Incremental change	In areas with reasonable access to services and facilities, including public transport.	GRZ
Substantial change	In areas with good access to services and facilities, including fixed-rail public transport (i.e., primarily around rail stations).	RGZ

Draft Neighbourhood Character Study (Mesh, 2019) + Peer Review (Glossop Town Planning, 2021)

The draft Study was prepared to inform updates to the residential zone schedules and to establish a framework for protecting and enhancing Brimbank's neighbourhood character. A key limitation of this Study was that the existing zone boundaries were not to be reviewed, as these were defined by *Home and Housed*. The Study identified the existing character of Brimbank's residential areas, defined a preferred future character and made recommendations

²¹ Currently located in Clause 21.07-5, but proposed to be deleted in the draft new format planning scheme.

for changes to the residential zone schedules, including the introduction of design and neighbourhood character objectives, new variations to ResCode standards and changes to decision and application guidelines.

The Study was placed on hold following the release of PPN90 and PPN91 and was subsequently peer reviewed 2020 in the context of changes to State Government direction. The peer review made several recommendations to align the Study with the PPNs and best practice. This is now being addressed as part of this Project.

The analysis and findings of the Study are being used as a starting point for the Neighbourhood Character Influences section of this Background Report, with further analysis and verification having been undertaken to address gaps and to build a more robust basis for determining policy and other interventions to balance neighbourhood character with housing growth.

Brimbank Housing Strategy: Background Analysis (Urban Enterprise, 2021, updated 2022)

This report compiles and analyses demographic and development information as key a source of background information for this Project. The analysis includes details of Brimbank's population and housing profile, residential development trends, population and dwelling projections and residential land supply and capacity. In 2022, it was updated and reissued to reflect the 2021 Census data.

Several issues are identified for the Housing Strategy to address, which are used as the basis for analysis in this Background Report. A summary of the key influences has been synthesised into the Housing Influences chapter of this Background Report.

Affordable Housing in the City of Brimbank: Detailed Needs Assessment (Affordable Development Outcomes, 2021)

Assembles a range of data and analysis to understand the level of affordable housing need in Brimbank. It includes information about the number and type of households experiencing homelessness and housing stress, as well as the types of dwellings and amount of funding needed to provide sufficient affordable housing in Brimbank. Key findings include the existence of a mismatch between housing supply and household types and the need for 218 additional affordable dwellings per year. The findings regarding affordable housing need and recommendations regarding preferred locations for affordable housing are synthesised in the Housing Influences chapter.

Together We are Brimbank: Community Vision 2040, Council Plan 2021–2025 and Municipal Public Health and Wellbeing Plan

Together We are Brimbank integrates Brimbank City Council's Community Vision, Council Plan, and Municipal Public Health and Wellbeing Plan into a single document. It presents the community's aspirations for a transformed Brimbank and Council's plan for achieving it. As part of this, Council plans to leverage new development to improve housing and liveability outcomes. One of its key strategies is to use planning and assessment processes to facilitate housing diversity, development and population growth.

Brimbank Climate Emergency Plan 2020–2025

Brimbank's Climate Emergency Plan outlines Council's position on the climate emergency and its commitment to social transformation through municipal leadership and collaboration. It sets a net zero emissions target for Council operations by 2030 and for the municipality by 2040. A key target of its Resilient Rebuild theme is "Affordable 'climate resilient' housing." Under this, new housing should be built to higher environmental standards and existing buildings should be retrofitted to be more energy efficient. New housing should anticipate future climate contexts, protect at risk groups and contribute to 20-minute neighbourhoods that enable living locally and travelling sustainably.

Transport Priorities Paper 2022

Brimbank City Council's Transport Priorities Paper outlines transport-related issues and guides transportation infrastructure provision and advocacy. It describes 31 priority projects and initiatives across nine categories, many

of which are State Government projects. For State Government projects, Council will provide support and advocate for better outcomes. Within the municipality, Council will expand the cycling network, deliver electric charging facilities, and undertake the transition to an all-electric Council fleet. The projects and initiatives contained within the paper will help create a more sustainable and robust transportation network for residential areas of Brimbank.

These policies do not directly influence housing opportunities or constraints, but rather reinforce the positive opportunities presented by housing intensification and consolidation in activity centres and around public and green transport opportunities.

Brimbank Industrial Land Use Strategy 2018–2030

The Brimbank Industrial Land Use Strategy presents Council's vision for its industrial precincts. It establishes a clear PPF for facilitating investment and renewal of industrial areas and outlines actions that Council can implement as a planning authority. Mapping within the strategy illustrates land to preserve for industrial uses, as well as land in transitional areas that could potentially be rezoned for commercial or residential use.

The implications of industrial land buffer zones and interfaces as a constraint on housing intensification is discussed in more detail in the Housing Influences chapter.

Brimbank Parking Strategy 2019–2029

Brimbank City Council's Parking Strategy provides a framework for responding to local parking issues and sets out actions to guide Council's strategic approach to planning, provision, and management of parking. Its approach involves directing medium and high density residential development to nearby transport, employment and community facilities, and mandating the preparation of Green Travel Plans for developments of three or more units. With these initiatives, Council aims to 'unbundle' car parking from housing for large developments.

This is an important consideration for housing, as parking congestion is often raised by the community as a constraint on intensification of housing.

Council's clear position on this matter ensures that this Project can consider the opportunities of activity centres and nodes with certainty.

Revised Greenhouse Reduction Strategy 2013–2023

Refreshed in 2018, Brimbank City Council's Revised Greenhouse Reduction Strategy provides an update on emissions reduction efforts since 2013 and presents a roadmap for scaling up community action and achieving Council's target of 50% reduction in 2011 emissions by 2022/2023. Sustainable development initiatives include residential energy efficiency and solar programs delivered in partnership with community organisations and advocacy to other levels of government to make energy efficiency and renewable energy more accessible to renters and vulnerable groups.

The strategy also includes plans to introduce stronger ESD requirements into the Brimbank Planning Scheme. These ESD guidelines do not directly impact on housing, but may have indirect impact on neighbourhood character, where ESD design responses can change the look and feel of the built form.

Urban Forest Strategy 2016–2046

Brimbank City Council's Urban Forest Strategy presents an approach to increasing canopy cover from 6.2% to 30% by 2046 by planting 700,000 trees. This will involve tree planting on streets, in urban parks, along waterways and within private open space. Residents will be encouraged to undertake their own planting efforts on their property. The framework also contains strategies for reducing impervious surfaces and creating better community understanding of the urban forest, and it explores establishing a formal process to protect existing trees.

Housing does have an impact on the urban forest—intensification of housing has the potential to reduce space available for tree planting, and it can impact on street trees if not carefully considered. These are matters that will require policy responses in the Housing and Neighbourhood Character Strategies.

Innovate Reconciliation Action Plan 2019–2021

Prepared in consultation with Traditional Owner groups, the Brimbank Aboriginal and Torres Strait Islander Consultative Committee, and local Aboriginal and Torres Strait Islander peoples, Brimbank City Council's Reconciliation Action Plan seeks to strengthen Council's approach to reconciliation. It builds on the progress of the first reconciliation plan and lays out actions for improving relationships with Traditional Owners, cultivating greater understanding and respect for Aboriginals and Torres Strait Islanders, and enhancing the capacity of Aboriginal and Torres Strait Islander residents to improve their socio-economic status and determine their own future. The plan references the fact that Aboriginal and Torres Strait Islander peoples have lower rates of home ownership and labour force participation and are more likely to be living in one-parent families.

A Housing Strategy has limited scope to directly address these matters but addressing housing supply and choice through planning provisions can be a small part of a broader policy response.

Position Statement on Social and Affordable Housing

Brimbank City Council's [Position Statement on Social and Affordable Housing](#) outlines Council's position on social and affordable housing, as well as the principles, roles and pathways that guide Council's efforts. The statement aims to underpin improved engagement with residents and key stakeholders in developing a better approach to social and affordable housing provision. The position statement recognises that safe, secure and affordable housing is a human right and acknowledges the urgent need for more social and affordable housing in the municipality.

In Council's role as a 'planner', the paper outlines that Council should negotiate affordable housing contributions through discretionary policy and voluntary agreements.

For the purposes of this Project, we will be seeking to define principles for the preferred location of affordable housing in the context of this clearly defined need.

Every Aboriginal Person Has a Home: The Victorian Aboriginal Housing and Homelessness Framework (Aboriginal Housing Victoria)

Developed by Aboriginal Housing Victoria, this framework guides the improvement of housing outcomes for Aboriginal Victorians for the next 30 years. It aims to provide every Aboriginal Victorian with a home within a generation and meet the demand of 27,000 Aboriginal households by 2036. Objectives of the framework include increasing the supply of Aboriginal social and affordable housing, increasing the number of homes owned by Aboriginal people and communities, taking advantage of opportunities provided by Native Title and Treaties and employing levers such as inclusionary zoning.

Diverse and affordable housing will be a key focus for this Project, using planning levers within the current PPF.

3.4 Sunshine NEIC and Sunshine Precinct

Planning for the Sunshine Precinct is being led by DTP, formerly the Department of Transport (DoT). The proposed future housing capacity of the Precinct will have an influence on the supply of land needed to accommodate housing growth under this Project. The Project team is working closely with DTP to ensure that areas of overlap (if any) between this Project and the Sunshine Priority Precinct projects are considered, and that consistent approaches are taken wherever possible. This section provides an overview of relevant strategies and policies from a State perspective that will influence the Project.

Entire Precinct

Sunshine National Employment and Innovation Cluster Draft Framework Plan (VPA, 2017)

Presents a draft 30-year vision for the Sunshine NEIC. In doing so, it provides direction about future development in the area. Its framework, containing draft strategic outcomes and actions, aims to build on existing investments in healthcare and education, improve transport and amenity, encourage new businesses and services and coordinate further business investment. Mapping contained in the plan outlines precincts and land uses across

Brimbank, including key employment centres and an open space and trail network plan. The draft framework plan aims to facilitate a greater range of housing and accommodation in well serviced locations, especially the Sunshine MeAC. It is understood State Government are preparing a new Framework Plan, one which is intended to be final and that captures the significant Government investment announced after 2017.

Final Brimbank Response Strategy: Western Rail Plan, including Melbourne Airport Rail and Sunshine Super Hub (Brimbank City Council, 2019)

Brimbank City Council's Final Brimbank Response Strategy contains processes and projects to assist Council in delivering major projects in collaboration with the State Government under the Western Rail Plan. The Western Rail Plan includes the Melbourne Airport, the Sunshine Super Hub, Melton and Wyndham rail line electrification, and fast rails to Geelong and Ballarat. The strategy was specifically developed to aid Council in responding to the Western Rail Plan, coming up with a vision for the investment, and delivering beneficial outcomes. It references the need for the Western Rail Plan to align with land use and transport strategies and for Council to push land use priorities, including residential location, as a consideration.

Sunshine Precinct Opportunity Statement (DoT,²² 2021)

Sets a vision for the Sunshine Precinct, which is defined as an area encompassing Sunshine and Albion train stations, activity centres and surrounding 1.6km of neighbourhoods. The Precinct comprises three distinct hubs that will accommodate much of the Precinct's forecasted growth and change:

- > The Sunshine Station, which will be surrounded by new housing development.
- > The Albion Precinct, which will be a focus for jobs, innovation and services.
- > The Sunshine CBD, which will be a diverse civic hub with increased housing, shops and services.

The Precinct Opportunity Statement notes that the Sunshine Precinct is able to accommodate substantial housing growth, including social and affordable housing. Three growth scenarios are presented, with the 'base case' aiming to accommodate 55,000²³ people in the form of 21,000²⁴ higher density homes—a large proportion of the total housing supply needed in Brimbank.

Sunshine Priority Precinct Vision 2050 – Leading with Vision: A City Ready to Shine (Brimbank City Council, 2021)

Sets out a vision and framework for leveraging investment in the Sunshine Priority Precinct. With significant infrastructure and investment projects—including the Melbourne Airport Rail and Sunshine Super Hub—already underway, Sunshine is set to become a hub of innovation and economic activity. The area currently contains a diverse mix of residents, and it is seeking to double its residential population by 2050. It aims to facilitate the growth of diverse, safe, accessible and community focussed neighbourhoods with a range of affordable and sustainable housing options, nearby open space and access to public transportation and opportunities for active transport.

Neighbourhood Specific

Albion Neighbourhood Plan (Brimbank City Council, 2013)

Prepared in 2013 in response to community feedback about the Regional Rail Link works, the *Albion Neighbourhood Plan* provides key directions, strategies and ideas that seek to plan Albion in a logical and sustainable way. While this sets out a vision for the neighbourhood in terms of the public realm and capital works, it is not a strategic planning document. Further work has been required to assess its potential from a planning perspective.

²² Now DTP.

²³ Updated figures provided by DoT.

²⁴ As above.

This Plan and the neighbourhood character elements that it addresses are discussed in more detail in the Neighbourhood Character Influences chapter.

Sunshine Town Centre Sunshine Structure Plan (Brimbank City Council, 2014)

Outlines Council's strategy for realising the Sunshine Town Centre's full potential and transforming it into the capital of Melbourne's west, acknowledging future projects including the Airport Rail and the electrification of the Melton Railway line. The Structure Plan was implemented into the Brimbank Planning Scheme under Planning Scheme Amendment C105 through application of the ACZ and a range of other provisions.

While the Sunshine town centre is outside the scope of this Project, it is a key attractor for housing that will shape the neighbourhoods surrounding it.

St Albans Activity Centre Precinct Structure Plan (Brimbank City Council, 2011, revised 2015)

Implemented through Brimbank Planning Scheme Amendment C150, which rezoned areas in an around the activity centre and introduced a DDO. The influence of the DDO on character outcomes are discussed in the Neighbourhood Character Influences chapter. However, the activity centre itself, like the Sunshine town centre, is outside the scope of this Project other than as an opportunity to attract housing density and diversity in the surrounding neighbourhoods.

Keilor Downs Urban Design Framework (Brimbank City Council, 2018)

Prepared in 2018, the Keilor Downs Urban Design Framework is a vision setting document comprising design principles and concepts to guide future development of land within the Keilor Downs Activity Centre. The framework identifies large areas of undeveloped land that present opportunities to provide higher density development, including a diversity of medium to high density housing that caters to a range of abilities, ages and household structures (including families, singles and couples). It also notes that there is the opportunity to deliver a mix of one-, two- and three-bedroom dwellings and a mix of ground floor, reverse living and apartment typologies.

Sunshine West – Our 20-Minute Neighbourhood (DELWP and Brimbank City Council, 2019)

Sunshine West was identified by the State Government as a location to test implementation of the 20-minute neighbourhood framework as part of a pilot project. The project was delivered in three stages including community engagement, technical assessment and identification of future opportunities. DELWP (now DTP) identified that the Sunshine West neighbourhood—while a focus for growth and significant investment and home to a range of destinations suitable for a 20-minute neighbourhood—has experienced limited development. The neighbourhood remains low density (approximately 16 dwellings per ha), with only a few unit developments. The report found that the area around Glengala Village is an appropriate location for increased density and diversity of housing.

Sunshine Station Masterplan (DoT, 2022)

Identifies key proposals that will transform the area around Sunshine Station to support it as a transport 'super hub' and to provide direction for long term development in the area. The 'super hub' name describes Sunshine's role as the link between Melbourne Airport and Melbourne CBD and as the gateway to regional Victoria. The six transformational projects proposed by the masterplan are all located around three sub-precincts of the station area and are intended to rejuvenate the precinct and attract development.

3.5 Abutting Municipalities

Braybrook Regeneration Project (VPA)

Delivered through a partnership of VPA, DTP, Homes Victoria and Maribyrnong City Council, the Braybrook Regeneration Project will plan for the delivery of diverse and affordable housing, open space, community facilities, activity areas, and transport for Braybrook, just east of the Sunshine MeAC.

3.6 Summary of Findings

- > **Changes to State policy and guidance:** Changes to metropolitan population projections (Melbourne to reach 8 million by 2050) have focussed State Government policy on accommodation of more housing within established areas such as Brimbank. This, and other factors, have also driven a change in how housing and neighbourhood character policy is developed (PPN90), and how residential zones are used and implemented (PN91). This means that Brimbank City Council's current Housing Strategy (*Home and Housed*) is now out of date and must be revised. Changes to State policy directions contained within *Plan Melbourne* (in particular, those relating to major transport infrastructure investment, the Sunshine Precinct, and the 20-minute neighbourhood framework), directs housing growth and change in different ways and will affect how we plan for housing in Brimbank.
- > **Use of residential zones in Brimbank:** Given the above, the following observations are made of the current residential zones in Brimbank:
 - The intention to limit change in areas that are not proximate to transport is no longer supported by State Government policy. These areas are expected to (and currently do), accommodate incremental change, where they are not otherwise constrained.
 - The NRZ is no longer a suitable planning control for limited change areas only. This zone also supports incremental change (up to two storeys), and building approvals show that incremental infill development is occurring in Brimbank's NRZ areas. The current drafting of the NRZ provides limited guidance for the community and decision-makers on neighbourhood character expectations.
 - The extent and application of the NRZ will need to be reviewed in the RDF having regard to the PPN changes, and particularly the two-storey height limit. Where there are constraints on development, or minimal change is proposed, additional planning mechanisms will be required to ensure the desired outcomes are achieved. These mechanisms may include specific NRZ schedules for minimal change areas, and/or use of overlays.
 - The RGZ is generally applied appropriately, however, does not appear to be delivering medium to high density development or substantial change, as anticipated by the zone. It also appears that there are conflicting messages in the drafting of the RGZ schedule in relation to expectations for change versus protection of neighbourhood character which may be limiting the ability for this zone to support higher density development. This Project will review further planning mechanisms (including zone extent and schedule review) to better support higher density development in appropriate locations and avoid possible underdevelopment in these areas.
 - The RGZ conflicts in some areas with the HO, and the PPNs provide greater guidance on managing these conflicts. This Project will need to balance the constraints on growth and change imposed by the HO.
 - The GRZ is subject to both infill and more major redevelopment, which is consistent with the current PPN expectation for incremental and substantial growth. This Project will need to review the extent of this zone and the drafting of the schedule to better reflect expectations regarding neighbourhood character.
 - Due to the date they were drafted, all residential zone schedules in the Brimbank Planning Scheme are silent on Objectives. As part of this project (in particular, the Neighbourhood Character Strategy), there is substantial scope to set out clearer expectations regarding design or neighbourhood character outcomes in different neighbourhoods and precincts by using these provisions.
 - This Project will need to review all variations to ResCode provisions in the context of Housing and Neighbourhood Character objectives, and in accordance with the enhanced drafting guidelines provided in PPN91.
- > **Investment in Sunshine:** The Sunshine Precinct will be a major influence on housing in Brimbank over the next 30 years. It has the capacity to accommodate a large proportion of housing supply and to

stimulate housing growth and diversity in surrounding neighbourhoods. The investments being made in Sunshine are expected to improve the commercial viability of high density housing in the medium term. This Project will focus on the influences on surrounding residential neighbourhoods, rather than the Precinct itself, which is being planned by DTP.

- > **Influence of Council policies:** Council has a range of policies, strategies and policy positions that will directly and indirectly shape housing opportunities and constraints in Brimbank. These include (but are not limited to) policies relating to climate change action, the urban forest, transport and industrial areas. Policy and positions (State and local) in relation to affordable housing all indicate that this is an important matter to be addressed in Brimbank for a range of vulnerable community members. This Project will focus on the land use planning aspect of this topic—specifically preferred locations for affordable housing—while acknowledging that this is a small part of a broader policy response.



Brimbank
City Council

Part 2 Key Influences

Housing Influences

- 4.1 Drivers of Housing Need
- 4.2 Housing Growth Opportunities
- 4.3 Housing Growth Constraints
- 4.4 Summary of findings

Neighbourhood Character Influences

- 5.1 Drivers of neighbourhood character
- 5.2 Planning Influences on Character in Brimbank
- 5.3 General Influences on Character in Brimbank
- 5.4 Contributors and Threats to Neighbourhood Character
- 5.5 Emerging Character Types and Precincts
- 5.6 Areas of significance
- 5.7 Summary of findings

Conclusion, Emerging Themes and Next Steps

- 6.1 Housing
- 6.2 Neighbourhood Character
- 6.3 Next Steps

mesh

Prepared by Mesh in collaboration with Brimbank City Council

Part 2: Key Influences

4. HOUSING INFLUENCES

To understand the influences on housing in Brimbank, this chapter focusses on the drivers of current and future housing needs, as well as the spatial opportunities for and constraints on housing growth across the municipality.

4.1 Drivers of Housing Need

Brimbank's population and demographic profile affects how much, where and what types housing is needed.

This section looks at key changes to Brimbank's *population and its demographics*, identifies the current capacity for housing growth in Brimbank's suburbs (*supply*), and identifies key trends in the types of housing that will be needed in the future (*diversity*).

This summary information has been sourced from the 2021 *Brimbank Housing Strategy: Background Analysis Report*.²⁵ Further details and analysis, including suburb by suburb analysis, can be found in that report.

Additional information regarding affordability and affordable housing supply is also sourced from the 2020 *Affordable Housing in the City of Brimbank: Final Research Report*.²⁶

Population and Demographic Change

Population and demographic change are major drivers of housing need, and projections of each are used to plan for housing growth. The 2021 *Brimbank Housing Strategy: Background Analysis Report*,²⁷ undertaken by Urban Enterprise, draws upon two sources in its discussion and analysis of population-driven housing need: VIF 2019 (the official State Government projection, based on historical trend analysis and expert assumption) and Forecast .id (private specialist projection, based on new residential development and demographic assumptions). As Forecast .id's forecast was done in 2021, from new Census data, it has taken into account the effects of the pandemic, while VIF's projection has not. As such, Forecast .id's population projections, which are substantially lower than VIF's, are preferred. Notwithstanding, either scenario can be comfortably accommodated within the capacity available in Brimbank's residential zones (see below Housing Supply section).

While Brimbank has experienced moderate but consistent population growth over the past 10 years, both the Forecast .id and VIF projections predict that in the coming years, the population will continue to increase, but the rate of population growth will decline.

The Forecast .id projection predicts that the Covid19 pandemic and closure of Australia's international borders will continue to impact short term growth projections, but that, in the longer term, immigration will rebound. It expects Brimbank's population to grow by approximately 34,000 residents over the period from 2021 to 2041. This will require an additional 13,771 dwellings over the 20-year strategy period.

²⁵ Urban Enterprise 2021 (updated 2022), *Brimbank Housing Strategy: Background Analysis*, Brimbank City Council.

²⁶ Affordable Development Outcomes 2020, *Affordable Housing in the City of Brimbank: Final Research Report*, Brimbank City Council.

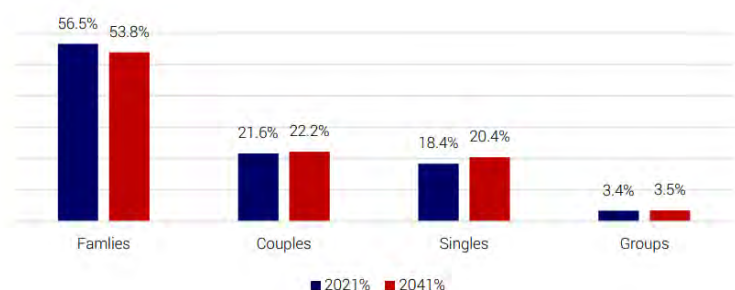
²⁷ Urban Enterprise 2021 (updated 2022), *Brimbank Housing Strategy: Background Analysis*, Brimbank City Council.

Table 3: Population and dwelling projections (Source: Urban Enterprise 2021, derived from Forecast .id [Informed Decisions] 2021)

Brimbank	Forecast .id Scenario
Additional population (2021 to 2041)	33,964
Annual increase (average)	1,698
Additional dwellings (2021 to 2041)	13,771
Annual increase (average)	689
Ave. household size	2.4

Brimbank, like many areas, is experiencing an ageing population and a declining household size. This affects the type of housing that is needed. Households with one or two people (e.g., single person or adult couple households) are expected to experience the greatest growth; however, families are also expected to increase. By 2041, the percentage of families is expected to decrease by 3% to 34.8% of the population, lone person households are expected to increase by 2% to 20.4% of the population, and couple households are expected to increase by 1% to 22.2% of the population. One parent families, other families and group households are expected to remain approximately the same.

Figure 13: Change in Brimbank household composition 2021 to 2041 (Source: Urban Enterprise 2021, based on Forecast .id projections)



Despite a comparable median age to the rest of Melbourne, the proportion of older people (70+) is expected to increase substantially, and this demographic will likely make up over 40% of Brimbank's projected population growth from 2016 to 2041.²⁸ This highlights the need to ensure the housing market meets the needs of the ageing population, providing opportunities to downsize or to move into appropriate aged care housing as needed.

Brimbank also has one of the most socio-economically disadvantaged populations, ranking 2nd most disadvantaged in Metropolitan Melbourne and the 7th most disadvantaged in Victoria. While there is no forecast for how this will change in the coming decades, the period from 2011 to 2016 saw an overall increase in the level of disadvantage, and as of 2021, Brimbank still had a significantly lower median weekly household income than the metropolitan Melbourne average.²⁹

²⁸ Urban Enterprise 2021 (updated 2022), *Brimbank Housing Strategy: Background Analysis*, Brimbank City Council, p.35.

²⁹ Ibid, p.36–37.

Housing Supply

Brimbank, as an established municipality, has no broad hectare land supply available. This means that Brimbank's future housing supply can only be delivered through infill development, urban renewal and major redevelopment sites.

Over the past 10 years, most housing growth (73%) has occurred in Deer Park and Sunshine, with substantial growth also experienced in St Albans.

Urban Enterprise has estimated the capacity of Brimbank's existing neighbourhoods to accommodate new housing, including activity centres. While activity centres and commercial areas are technically outside the scope of this Project, the capacity of these areas to accommodate housing will influence the capacity demands of residentially zoned areas.

Urban Enterprise has estimated that Brimbank's neighbourhoods have more than enough theoretical capacity to meet its forecast housing needs. However, much of this capacity requires the redevelopment and intensification of existing residential areas, which can be a slow to change.³⁰

Table 4: Estimated dwelling capacity by type (Source: Adapted from Urban Enterprise 2021)

Type of development	Estimated dwelling yield	Percentage of total
Major redevelopment sites	3,954 ³¹	6%
Sunshine Major Activity Centre	9,100 ³²	14%
Watergardens CDZ	4,000 ³³	6%
Commercial 1 Zoned land with residential development capacity (St Albans Major Activity Centre and Keilor Downs Major Activity Centre)	1,853 ³⁴	3%
Infill development (in residential zoned areas)	44,560	70%
TOTAL	63,466	100%

DEFINITIONS

Broad hectare

land supply refers to largescale vacant sites that can be subdivided into new neighbourhoods with new homes.

Infill development

refers to incremental redevelopment within residential zoned land, including development of units, townhouses and apartments on sites that formerly had single homes or other types of development.

Urban renewal areas and major redevelopment sites

are often large areas that are no longer suitable for their original purpose and would benefit from redevelopment or are areas that have substantial capacity for change through redevelopment.

³⁰ Urban Enterprise 2021 (updated 2022), *Brimbank Housing Strategy: Background Analysis*, Brimbank City Council, p.142–144.

³¹ Includes estimated yield from both the UDP Major Redevelopment Sites and other development sites identified by Council.

³² The yield from Sunshine is a high-level Council estimate only. Planning for this precinct is being undertaken by DoT, which may have different yield assumptions.

³³ This yield estimate relies on a range of assumptions outlined in the Urban Enterprise report.

³⁴ Includes the combined estimated yield of St Albans and Keilor Downs Major Activity Centres.

Market Trends + Affordability

Purchase and rental prices for houses and units are generally lower in Brimbank compared with many other parts of metropolitan Melbourne, including neighbouring inner-city municipalities. This is likely to continue to attract people looking for affordable housing to Brimbank's housing market.

Table 5: Median property prices 2019 (Source: Urban Enterprise 2021)

Area	Property Type	Median Price (2019)
City of Brimbank	House	\$610,000
	Unit	\$435,000
	Vacant	\$573,500
Metropolitan Melbourne	House	\$720,000
	Unit	\$565,000
	Vacant	\$319,500

However, this does not necessarily mean that Brimbank's housing supply is affordable. When factoring in relative incomes, Brimbank's housing is decreasing in affordability, and people on lower and middle incomes are expected to experience increasing affordability challenges when seeking to purchase a home in Brimbank (or elsewhere). Rental affordability has also dramatically decreased in Brimbank over recent years, with only 15% of rentals in Brimbank considered to be 'affordable'. The Affordable Housing Research Project estimated that 23% of households in the very low, low, or moderate income categories³⁵ are in housing stress, meaning they are spending more than 30% of their income on housing costs (14% of all households in Brimbank). The latest Census data indicates that household rental stress has increased further. Looking at all households across all income categories in Brimbank, the 2021 Census found that 33.3% of all households in Brimbank are in rental stress and 18.9% of all households in Brimbank are in mortgage stress. In addition, several groups of people are either homeless, or at risk of homelessness.

Despite lower median house values, Brimbank has also experienced strong price growth (more than 6% per annum between 2009 and 2019), and significantly higher price growth since 2013 (when the previous Housing Strategy was prepared).

There is strong demand for separate houses, but the availability of this housing type is declining. This is impacting affordability, and it may increase demand for townhouses, which are currently seen as a 'second choice' for homebuyers. Apartments make up a small proportion of the housing stock in Brimbank, with limited demand for this housing form outside of investors who rent to young singles, couples and students.

Urban Enterprise projects that demand for apartments in Activity Centres will grow over time once infill development opportunities are exhausted and land values rise.

The *Affordable Housing Research Report* estimates a current shortfall of more than 4,000 affordable housing dwellings in Brimbank. This shortfall will increase to more than 5,000 by 2041 if supply is not increased. While many larger households experience housing stress, limited housing diversity means that single adult households on very low and low incomes are the most likely to be in need. The research report also indicates that affordable housing provision should prioritise smaller dwellings in well-located areas.

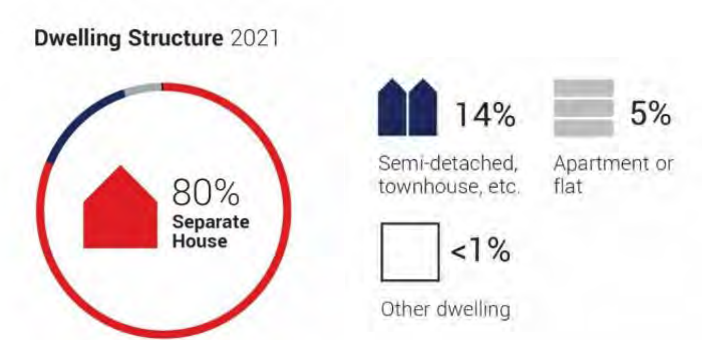
³⁵ Established by the State Government and specified in *Planning and Environment Act 1987*.

Diversity

While there is substantial theoretical capacity to meet Brimbank's housing needs, it is also important to examine whether the type of housing available meets the needs, lifestyle and preferences of the current and likely future population. The availability of different housing options to meet these needs is referred to as housing diversity.

Brimbank's current housing supply is very homogenous—most dwellings are separate houses (80%) and the Brimbank housing market remains driven by demand for detached housing.³⁶ However, projected changes to the characteristics of Brimbank's population and the configuration of households, coupled with changes in market trends, will drive demand for different housing forms, scales, locations and tenures.³⁷

Figure 14: Brimbank dwelling structure breakdown (Source: Urban Enterprise, 2021)



Urban Enterprise undertook an assessment of the suitability of current and future housing availability, by typical household type and housing preference, and noted the following:³⁸

³⁶ Urban Enterprise 2021 (updated 2022), *Background Housing Strategy: Background Analysis*, Brimbank City Council.

³⁷ Ibid. p.45.

³⁸ Ibid. p.143.

Families will generate the greatest housing demand in 2041 (54% of the market). They generally prefer separate houses and townhouses. Limited supply of separate houses will affect affordability and preferences may be redirected to townhouses, which are increasing in supply, with capacity for more.

Couples (including downsizers) will represent 22% of the 2041 market. They prefer separate houses, townhouse or apartments. While supply of smaller housing forms such as townhouses is increasing, these may not be suitable for all couples, particularly downsizers. There is high capacity for apartments, but a range of market and development forces are limiting their delivery.

Singles will form an increasing part of the market, going from 18% in 2021 to 20% in 2041. Singles have a propensity to live in townhouses and apartments, but they also live in separate houses. While an increasing townhouse supply will suit this market, a lack of smaller housing types (e.g., one bedroom homes), slow delivery of apartments and declining rental affordability will likely be a challenge.

Groups are a small market segment (3%). They prefer separate houses and townhouses. Declining rental affordability and competition for separate houses will affect groups.

DEFINITIONS

Housing diversity

A variety of housing sizes and types. Seen as desirable due to the premise that people need different types of housing depending on their lifestyle and life stage.

Form

The physical type of dwelling, often associated with a certain age or lifestyle. Includes detached homes/separate houses, semi-detached, townhouses, unit, apartments, and specialised housing (e.g., retirement villages, aged care facilities, student housing).

Scale

Refers to the size of a dwelling. Measured by floor area, number of bedrooms, and/or size of lots.

Location

Where a dwelling is within a geographical area. Often thought about in association with proximity to desired features or attractors.

Tenure

Ownership status of a dwelling, typically either homeownership or rental.

Environmentally Sustainable Design

Although not a direct driver of housing need, sustainability and the inclusion of ESD elements is increasingly becoming an important consideration when assessing development applications. The inclusion of ESD elements not only contributes to broader environmental aims, but it can improve the affordability of housing through energy efficiency gains, as well as enhance the well-being of occupants by reducing the use of toxic materials and improving thermal comfort.

Brimbank Planning Scheme policy at Clause 22.02 aims to integrate ESD principles into land use planning, new development, and redevelopment. However, as elements of ESD related to internal design and building material choice fall under the Building Code rather than the planning provisions, this policy is limited in the degree of sustainability it can require. Furthermore, under the current structure of the planning system, ESD policy only applies to multi-unit dwellings, not single dwellings on lots.

While this Project will not introduce ESD-related requirements, it can explore whether there are policy mechanisms that can be used to enhance good design in order to promote better sustainability outcomes. This could potentially include encouraging shading elements or devices in housing design (which tend to be more common in older styles of housing), enhancing landscaping outcomes (which have a cooling affect), and encouraging siting and design that aligns with passive design principles. At a municipality level, this Project can also work to enhance sustainability by facilitating housing growth and intensification in areas close to activity centres and public transportation that have good walking and cycling infrastructure, enabling more residents to engage in active transport.

Summary of Drivers of Housing Need

Brimbank's growing and aging population will drive its housing need in the coming decades. While Brimbank has the theoretical capacity to meet future housing demand, the challenge will be to convert this theoretical capacity into actual supply, while delivering housing that serves the needs of its population. This will require housing that is more diverse, affordable and environmentally sustainable than has been delivered in the past.

4.2 Housing Growth Opportunities

Areas that present opportunities for housing growth have attributes that enable them to support State direction to consolidate, redevelop and intensify existing urban areas and to promote liveability. These attributes include:

- > Proximity to activity centres, public transport and open space.
- > Investment in new infrastructure and major redevelopment sites that can catalyse further residential growth.
- > The walkability of neighbourhoods and their ability to support denser housing forms.

To promote liveability, housing growth should generally be directed to areas that already have the components of a 20-minute neighbourhood. This means increasing housing density and diversity in areas around activity centres, along key public transport routes and accessible open space. In Brimbank, these areas are mostly located in the southern and central parts of the municipality. In terms of zoning, housing growth should occur in the RGZ and to a lesser extent in the GRZ and NRZ.

The following sections provide more detail on housing growth opportunities.

Activity Centres

Directing housing growth and encouraging housing diversity in activity centres is key to the 20-minute neighbourhood policy. Activity centres are important hubs for local shopping, services employment and education, and they play a key role in meeting people's daily needs.

State and local policy seek to direct housing growth within walking distance of activity centres. General benchmarks used for activity centres expect that people are willing to walk 400m–800m (5–10 minutes) to a neighbourhood centre or a larger centre.³⁹ Brimbank City Council's *Activity Centre Strategy 2018* sets a target of all households being within 1km of a local or higher order activity centre.⁴⁰

Brimbank comprises 55 activity centres of varying roles, forms and sizes. Activity centres in the southern and central parts of the municipality are more closely spaced and more walkable and accessible by pedestrians and cyclists. These centres tend to be in neighbourhoods that are older and gridded. Especially in and around the activity centres of Sunshine (which includes land in Albion) and St Albans, there is a clear opportunity for increased housing density and diversity. At present, significant RGZ areas are located around St Albans and Deer Park Major Activity Centres, with large areas of GRZ in the remainder of the walkable catchments.

Sunshine has fewer areas of RGZ; however, the ACZ in the central part of Sunshine is intended to support denser housing. DTP is leading planning for the area encompassing the ACZ plus residential catchments around Sunshine and Albion stations. It is targeting the addition of 29,000 jobs, 16,000 dwellings and 43,000 residents within the precinct by 2051,⁴¹ noting the potential capacity for tens of thousands more in each of these categories. The vision is for the precinct in the future to be a thriving residential, business and civic hub with high density built form (8–12 storeys) supporting an office economy.

³⁹ DELWP n.d., *20 Minute Neighbourhoods Checklist tool*, DTP website, accessed 14 Feb 2023, <https://www.planning.vic.gov.au/policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhood/resources-and-guidance>.

⁴⁰ Brimbank City Council 2018, *Brimbank Activity Centre Strategy 2018*, Brimbank City Council website, accessed 20 Feb 2023, <https://www.brimbank.vic.gov.au/plans-policies-and-strategies/strategies/brimbank-activity-centre-strategy>.

⁴¹ From a base case of 2021.

Further details about the opportunities presented by the Sunshine MeAC are provided in the Major Development Sites + Investment section of this Background Report.

Centres in the northern and western parts of the municipality, where residential development is more recent, tend to be further apart and more privatised (e.g., with internalised shopping malls) and less street based. These centres—including Watergardens, Brimbank Central and Cairnlea Town Centre—present challenges for pedestrian and cyclist access. However, they still offer a range of services, and directing housing growth to these locations may support their transition to a more walkable form. At present, there are areas of RGZ located around Watergardens, but a large proportion of the walkable catchment is zoned NRZ.

Typical walkable catchments to each centre are shown in Figure 15 as well as the residential zones located within each centre.

Table 6: Activity centres in Brimbank

Type of Activity Centre	Centres
Metropolitan Activity Centre	Sunshine
Major Activity Centres	St Albans Sydenham/Watergardens Brimbank Central Deer Park
Neighbourhood Activity Centres	Cairnlea Taylors Lakes Keilor Village Keilor Downs Delahey Derrimut
Local Activity Centres	44 local activity centres, generally comprising a small collection of retail and service business based around a convenience store.

The map displays the Brimbank LGA, outlined in red. Major roads include Calder Freeway, Western Ring Road, Princes Fwy, Melton Highway, Ballarat Road, Deer Park Bypass, and Calder Rd. Water features like Jackson's Creek, Taylor's Creek, Stony Creek, Glengala Drain, and Derrimut Drain are shown. Suburbs labeled include Keilor North, Keilor Lodge, Keilor Downs, Keilor East, Keilor Park, Tullamarine, Kealba, St Albans, Kings Park, Delahay, Albionvale, Cairnlea, Ardeer, Albion, Sunshine West, Sunshine North, Sunshine, Deer Park, Derrimut, Brooklyn, Hillsid, Sydenham, Taylors Lakes, and Calder Park.

DRAWING KEY

- Brimbank LGA
- Brimbank Suburbs
- Train Station
- Railway Corridor
- Planned Keilor East Station
- Planned Melbourne Airport Rail
- Urban Growth Boundary

ACTIVITY CENTRES

- Metropolitan Activity Centre
- Major Activity Centres
- Neighbourhood Activity Centres
- Local Activity Centres
- Metropolitan and Major Activity Centres 1km Radius
- Neighbourhood and Local Activity Centres 400m Radius

RESIDENTIAL ZONE TYPES

- Mixed Use Zone (MUZ)
- Residential Growth Zone (RGZ)
- General Residential Zone (GRZ)
- Neighbourhood Residential Zone (NRZ)
- Activity Centre Zone (ACZ)
- Comprehensive Development Zone (CDZ)

Public Transport

Public transport is critical to housing growth that supports vibrant, sustainable communities. Locating housing near safe and efficient public transport facilitates access to employment, education, services and shops; promotes sustainable travel; and contributes to housing equity by accommodating those who do not drive.

State and local policy encourages housing to be located near public transportation. State policy encourages development along existing and planned public transport infrastructure. Delivering housing that makes public transportation viable is also a hallmark of 20-minute neighbourhoods. Brimbank City Council's Council Plan, *Together We Are Brimbank*, seeks to increase the percentage of households within 400m (a 5-minute walk) of a bus stop or 800m (a 10-minute walk) of a train station, distances at which people are more likely to regularly use public transport.⁴²

Brimbank's public transport network comprises two train lines supported by a bus network, resulting in 39.3% of dwellings within 400m of public transport with regular service.⁴³ However, the current network has room for improvement, with many areas left without reliable, frequent and direct transport; particularly those only covered by buses. Although the bus route that runs from Watergardens Station to Deer Park Station is designated a Principal Public Transport Network (PPTN) route, this route is not currently considered an attractor due to its inconsistency and infrequency. As a result, many residents in the area remain reliant on private vehicles.

In the coming years, Brimbank will benefit from increased connectivity due to major infrastructure projects including the Melbourne Airport Rail, Western Rail Plan, Level Crossing Removal Project and Suburban Rail Loop. The future Melbourne Airport Rail will include a new train station at Keilor East with a direct connection to Sunshine and Melbourne Airport. Albion Station will be rebuilt, and the Albion-Jacana corridor will be upgraded so that it can accommodate the Melbourne Airport Rail line. The Level Crossing Removal Project will result in a rebuild of Deer Park and Ardeer Stations, improving the facilities at each station by providing additional parking and improved access to bus and train services. Should the Western Rail Plan be funded, electrification of this line will provide an even greater level of service. These projects will bring connectivity to some areas of Brimbank previously lacking in frequent and reliable public transport.

By directing new housing growth to areas close to public transport, Brimbank City Council can work toward its aim of reducing car dependency. The Sunshine (including Sunshine and Albion) and St Albans activity centres, which have residential areas near train stations earmarked for increased development, represent good opportunities for housing growth. Currently these areas are still dominated by low-rise 1–2 storey detached housing and very few apartments or townhouses. Deer Park is more constrained due its location near hazard facilities (see Section 4.3 below) and fewer train services than other stations, and as such, is experiencing more infill development in the GRZ than the RGZ (particularly along Doherty Street).

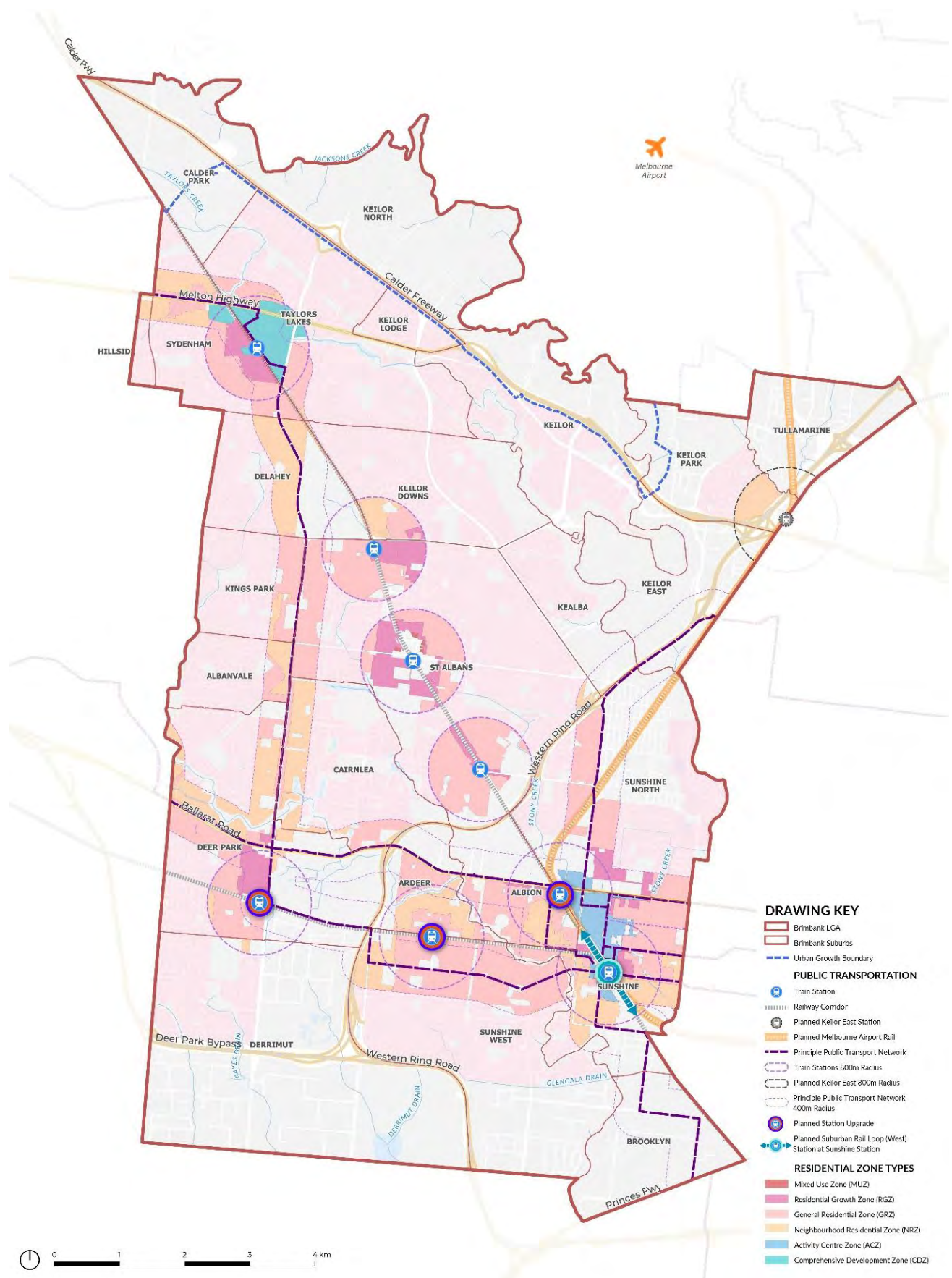
Public Transport	8 train stations
	37 bus routes



⁴² Australian Urban Observatory (AUO) (n.d.) <https://auo.org.au/portal/metadata/access-to-public-transport/>.

⁴³ Brimbank City Council (2022) *Transport Priorities Paper 2022*.

Figure 16: Public transport



Open Space + Recreation

Open space—in the form of parks, parklets, reserves, sporting fields and nature corridors—provides opportunities for exercise, relaxation, socialisation and connection with nature. Locating housing near open spaces encourages residents to live healthier lifestyles by providing them with opportunities to engage in activities that support their physical and mental wellbeing.

The provision of open space is an important component of State and local policy. High quality open space is a critical element of 20-minute neighbourhoods, with State policy setting a benchmark of locating housing within 400–800m of high quality open space.⁴⁴ Brimbank City Council's 2016 *Creating Better Parks Policy & Plan* shows the provision of open space in Brimbank as well as the locations of parks and playgrounds.⁴⁵ While this plan does not analyse gaps in the provision of open space, mapping done for the purpose of this Project reveals that there are gaps in the network along the edges of the municipality, where there are residential areas located further than 500m from the nearest public open space Figure 17.

Areas around the Sunshine, Albion and St Albans activity centres are well-served by public open space. These areas provide a good opportunity for housing growth. The RGZ of the Deer Park activity centre is adequately served by public open space, but it is directly adjacent to a gap area. Brimbank Central is well-located in terms of open space provision, but it is not as well-served by public transportation as other locations.

It is also the case that some open spaces in Brimbank, although located near residential areas, are not easily accessible due to their layout/orientation or lack of pedestrian infrastructure. Examples include Sydenham Park, Organ Pipes National Park, Brimbank Park, upstream parts of the Maribyrnong River (layout/orientation constraints) and Parks Vic grassland reserves (lack of pedestrian infrastructure). Residential areas near these sites may not be as suitable for increased residential density.

In addition to open space, Brimbank contains community facilities that provide opportunities for recreation and leisure. One of the most notable is the new Brimbank Aquatic and Wellness Centre, a regional facility located in Keilor Downs, which opened in September 2022.⁴⁶ Others include the Sunshine Leisure Centre and several local community centres. While these community facilities act as significant attractors, it may be the case that a standalone facility—one not part of an existing activity centre—would not be enough of an attractor alone to support high density housing outcomes.

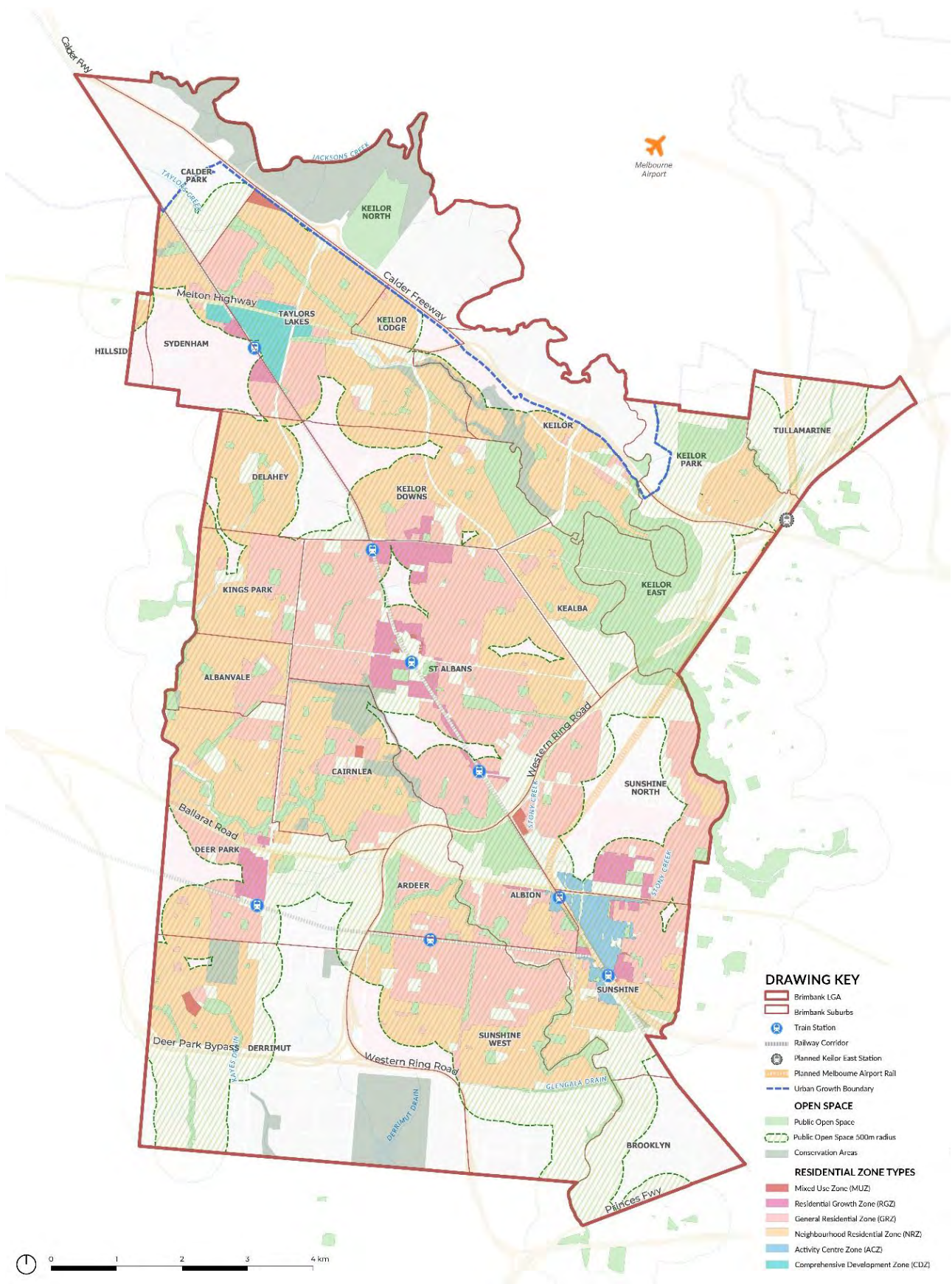
During the next phases of the Project, it will be important to not just consider walkable access to open space (i.e., the 500m radius to open space), but also more direct relationships between housing and open space. Higher density housing often relies on enhanced amenity of immediate proximity to open space, and as such, areas opposite and adjacent to open space areas present enhanced opportunities for housing change.

⁴⁴ DELWP n.d., *20 Minute Neighbourhoods Checklist tool*, DTP website, accessed 14 Feb 2023, <https://www.planning.vic.gov.au/policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhood/resources-and-guidance>.

⁴⁵ Brimbank City Council 2016, *Creating Better Parks Policy and Plan*, City of Brimbank website, accessed 14 Feb 2023, <https://www.brimbank.vic.gov.au/plans-policies-and-strategies/policies/creating-better-parks>.

⁴⁶ Brimbank City Council n.d., *Brimbank Aquatic and Wellness Centre is now open*, Brimbank City Council website, accessed 14 Feb 2023, <https://leisurecentres.brimbank.vic.gov.au/news-and-events/brimbank-aquatic-and-wellness-centre-officially-open>.

Figure 17: Open space



Major Development Sites + Investment

Major public sector investment in Brimbank presents opportunities for housing growth and development. The Sunshine NEIC, Sunshine Priority Precinct, SHWEP and Sunshine MeAC will likely be catalysts for housing growth within nearby residential catchments, as they will offer significant health, education, wellbeing and employment opportunities and transport upgrades (see call-out box). However, as these are substantial projects, this is likely to be a relatively long-term proposition.⁴⁷

Planning for precinct development and major development sites suggests that there is an emerging market for diverse housing forms, including apartments. The development of diverse housing forms within these sites may serve as a catalyst for further redevelopment of the surrounding areas. To understand the conditions that may support these emerging opportunities, and the spatial relationships that support more diverse housing, major redevelopment sites identified in the Urban Enterprise report⁴⁸ are mapped in Figure 18.

The major development sites proposing apartments are concentrated in three areas:

1. Sunshine/Sunshine North/Albion, in and around the Sunshine MeAC
2. St Albans around Victoria/Albert Crescent, within the St Albans Major Activity Centre
3. Sydenham, along Melton Highway and Sydenham Road

These sites are generally located in the RGZ, or other zones that support higher density development (including the C1Z and the ACZ). None are located within the NRZ. Major redevelopment sites that do not comprise apartments are more broadly distributed across the municipality.

Transitional sites identified in the *Brimbank Industrial Land Strategy 2018-2030 (BILS)*, as well as the Broadcast Australia site (which is currently zoned SUZ2), are also considered to be potential sites for development (subject to further investigations and a successful planning scheme amendment process).

PUBLIC SECTOR INVESTMENT AND HOUSING

Public sector investments in Brimbank—while not directly focussed on housing—are likely to impact the housing landscape.

The **Sunshine NEIC** focusses on delivering employment and innovation. While the intent is not to deliver housing growth, housing growth is likely to occur as a result of increased job opportunities.

The **SWEP** focusses on health, wellbeing and education. It similarly does not deliver housing, but housing growth is a likely flow-on effect.

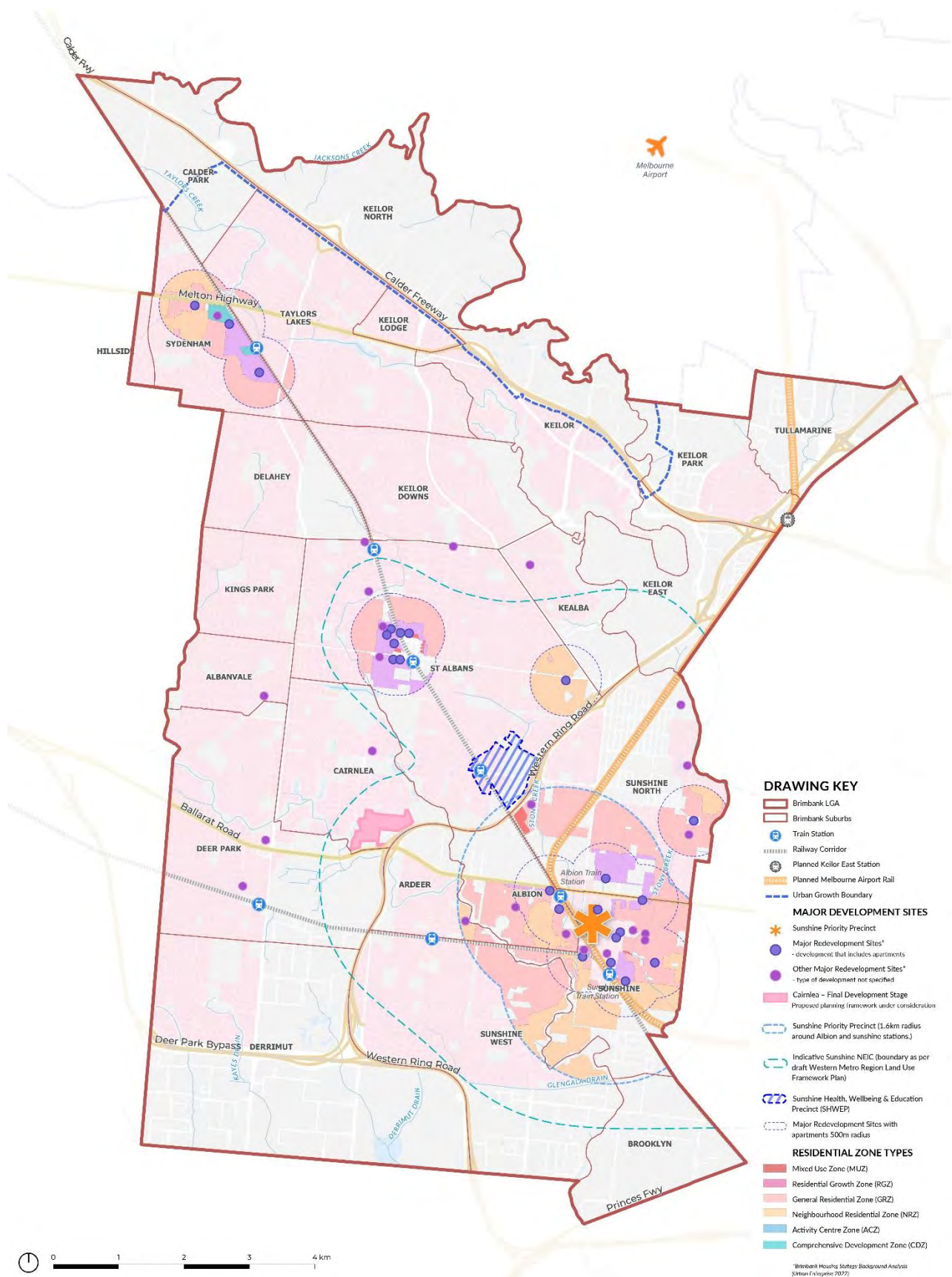
The **Sunshine Priority Precinct** is a designated renewal area. While this area is not residentially zoned, and thus not within the scope of this Project, the growth of this area will likely contribute to surrounding growth and influence housing choice in nearby residential areas.

Other public transport upgrades and land use changes include upgrades to Sunshine and Albion Stations, the addition of the Melbourne Airport Rail and change envisaged for industrial land in Albion/Ardeer. While these are not coupled with plans for housing growth or density targets, these changes will influence the potential for housing growth in these areas.

⁴⁷ Urban Enterprise 2021 (updated 2022), *Background Housing Strategy: Background Analysis*, Brimbank City Council, p. 147.

⁴⁸ Ibid. p.149.

Figure 18: Major redevelopment sites and investments



Walkability + Green Travel

Directing housing growth to areas that are highly walkable and have access to high quality pedestrian and cycle networks contributes a range of health, wellbeing and sustainability objectives.

Brimbank's street networks are generally considered more walkable in the southern and central parts of the municipality, where streets are gridded and permeable. This is reflective of the historical subdivision pattern. In the northern and western parts of the municipality, road networks tend to be more curvilinear, less permeable, and less walkable; this reflects a subdivision pattern that has been preferred in more recent decades.

The *Transport Priorities Paper 2022*⁴⁹ and *Revised Greenhouse Reduction Strategy 2013–2023*⁵⁰ both prioritise active travel and advocate for an expanded cycle and pedestrian path network. They encourage housing growth in areas with existing or planned cycle and pedestrian path networks, increased tree canopy coverage and passive surveillance of local parks to support active transport.

Brimbank City Council's *Activity Centre Strategy* provides an analysis of the walkability catchment around activity centres and finds that Brimbank generally has a well-connected network of centres. There are some gaps in parts of Taylors Lakes, Keilor (west of Green Gully Road), Kings Park, parts of Deer Park along the municipal boundary and small parts of Albanvale and south Sunshine. It is noted that the Sunshine Masterplan (prepared by DoT) includes a range of initiatives intended to activate the Sunshine MeAC and improve accessibility to the Sunshine train station.

Figure 19 highlights Brimbank's gridded street layouts, cycle links (existing and proposed), public open space, and train stations, the existence and proximity of which shape walkable neighbourhoods.

Walkable catchment circles are not included in Figure 19, but are shown on maps in this Background Report specific to a certain attractor (e.g., public open space).

WALKABILITY

Walkability is a measure of how easily pedestrians can navigate an area on foot.

A place that is highly walkable has:

high quality pedestrian infrastructure

(e.g., accessible footpaths, pedestrian crossings, wayfinding signage)

connected streets

(i.e., relatively few dead-ends or cul-de-sacs) and

attractors

(e.g., shops, community facilities, schools, and public transport) **located within a walking distance—typically considered to be around 400–800m (a 5–10 minute walk).**

Measures of walkability may also factor in dwelling density, with higher densities correlating to higher levels of walkability.

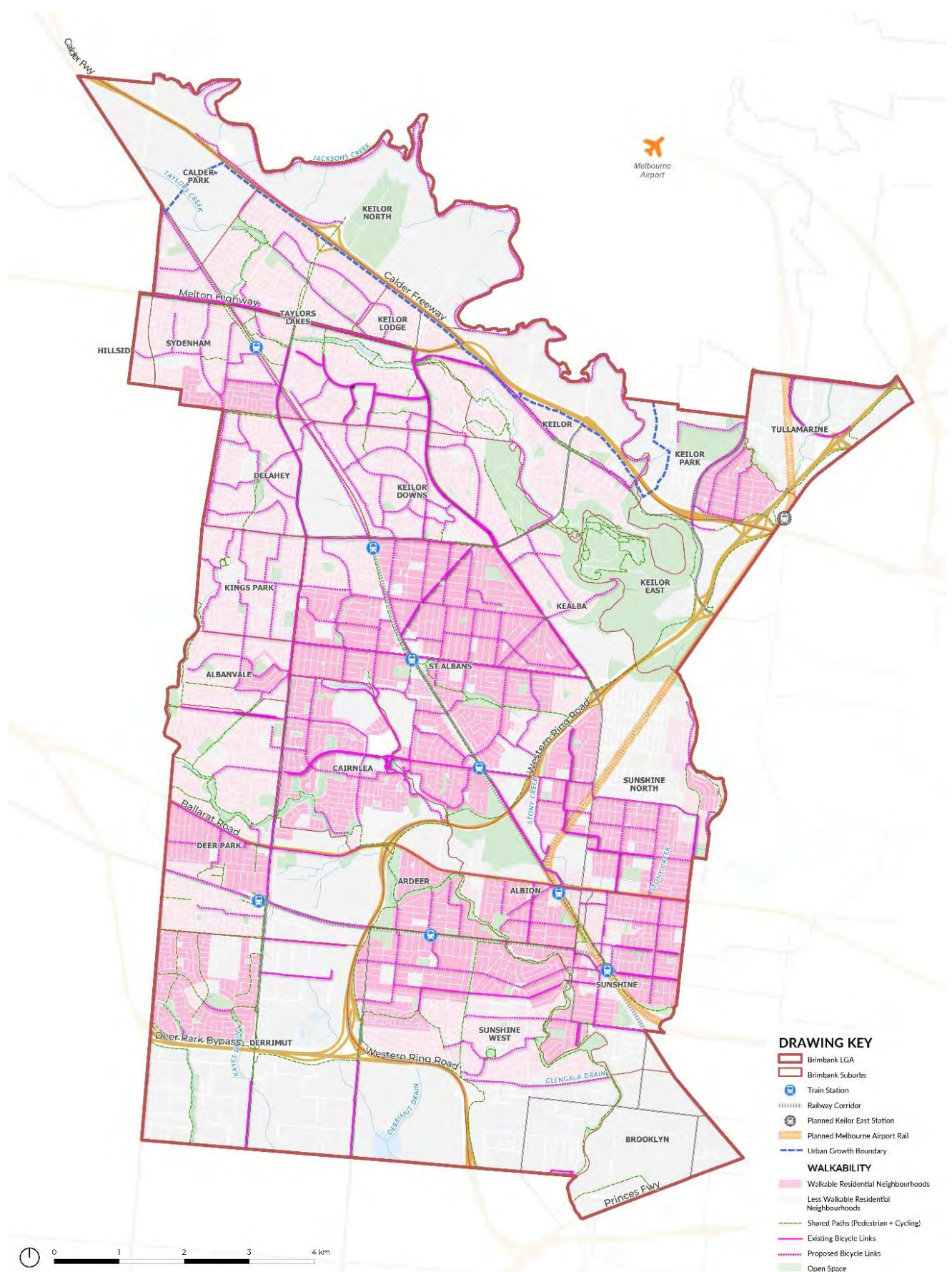
Walkability is considered to be a positive attribute of an area because it promotes sustainable travel as well as increased health and well-being due to

Within Brimbank, the most walkable areas tend to be located nearer to activity centres and have a gridded street layout.

⁴⁹ Brimbank City Council 2022, *Transport Priorities Paper 2022*, Brimbank City Council website, accessed 15 Feb 2023, <https://www.brimbank.vic.gov.au/transport-priorities-paper>.

⁵⁰ Brimbank City Council 2018, *Revised Greenhouse Reduction Strategy 2013–2023*, Brimbank City Council website, accessed 15 February 2023, <https://www.brimbank.vic.gov.au/plans-policies-and-strategies/strategies/greenhouse-reduction-strategy#:~:text=The%20Greenhouse%20Reduction%20Strategy%202013-2023%20is%20part%20of,and%20actions%20to%20be%20delivered%20over%2010%20years.>

Figure 19: Walkable neighbourhoods



Opportunities Summary

The opportunities identified in the sections above have been overlapped to produce a 'heat map' that demonstrates where opportunities are most concentrated (Figure 20). Some of the mapped layers present greater opportunities for housing growth and change than others, and these will be considered carefully when preparing the Housing Strategy. These opportunities will be carefully balanced with the constraints to housing growth summarised in the following section of this Background Report. The heat mapping identifies Sunshine, St Albans, Sydenham, Deer Park and Keilor as locations with the greatest opportunity. Each is discussed below.

Sunshine and surrounds

The greatest concentration of opportunities, as demonstrated by the heat map, is in Sunshine, around the Sunshine and Albion train stations/activity centres. This area is well serviced by public transport (trains and busses) and has access to shopping areas, civic and community services, and opportunities for jobs and education. There is also a range of nearby open spaces, including small parks, playgrounds, current and future sporting fields and linear links (e.g., Kororoit Creek), and the neighbourhoods are highly walkable due to their gridded street network. As discussed in earlier sections of this Background Report, these areas have also been identified for substantial government investment and planning, which will encourage future housing growth and employment opportunities.

St Albans and surrounds

St Albans also has a high concentration of opportunities for housing growth. Features that support increased housing in this area include the existence of Major Activity Centre, a train station, and a gridded street network and access to local open space.

Sydenham and surrounds

While Sydenham has a smaller area of highly concentrated opportunity than Sunshine and St Albans, it has Sydenham Major Activity Centre (Watergardens), which is an established centre providing services, facilities and employment opportunities. Watergardens train station provides access to the city via the Sunbury Line, access to regional Victoria on V/Line services and bus connections to Moonee Ponds, St Albans and Caroline Springs.

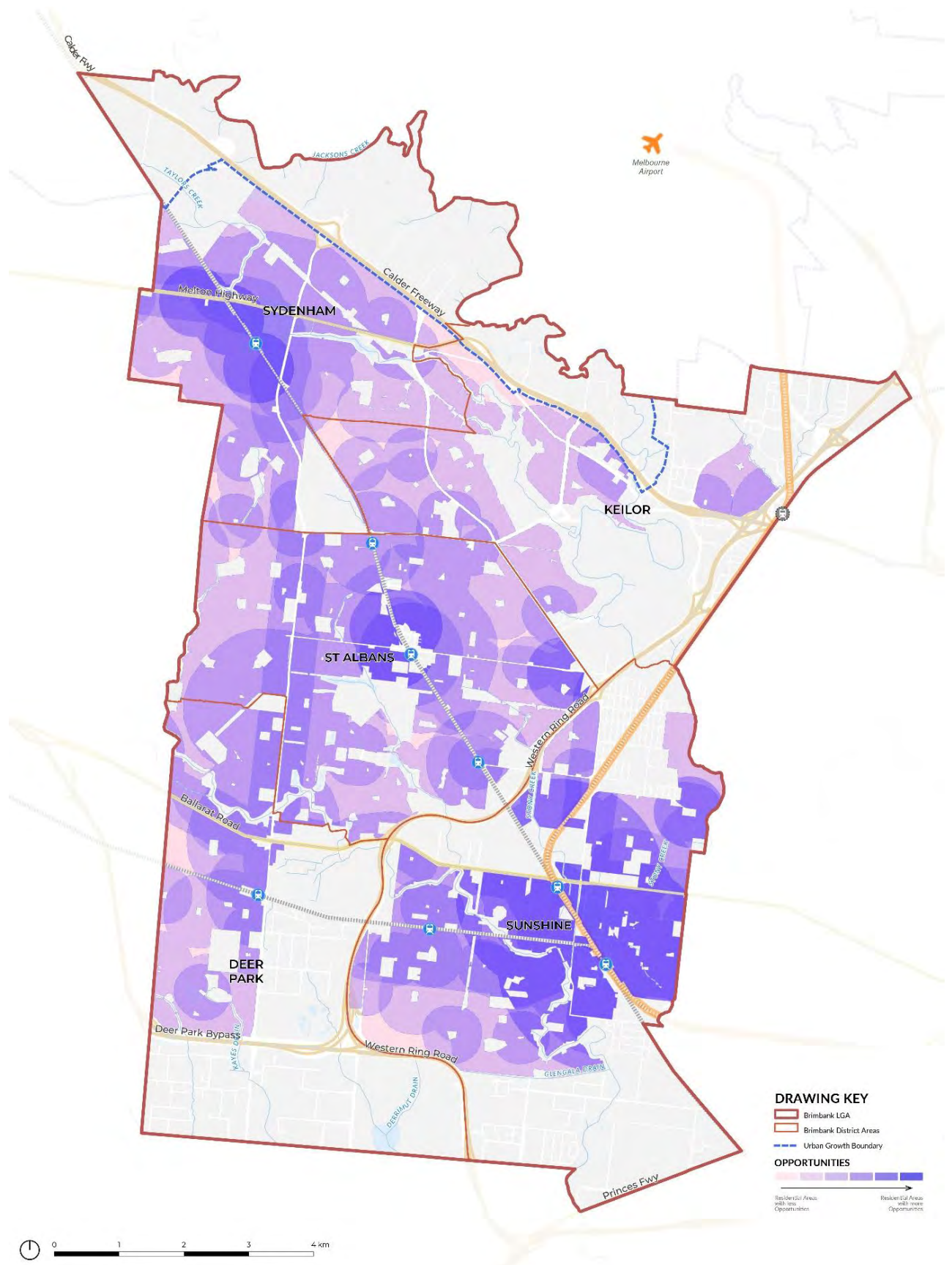
Deer Park and surrounds

Deer Park has access to a Major Activity Centre, a train station, community facilities and several open spaces. While its transportation network is currently reliant on a north-south bus line to reach some parts of the municipality, the planned upgrades of Deer Park and Ardeer Stations is set to improve the quality of public transportation in the area.

Keilor and surrounds

There is some, albeit less, opportunity for housing growth in Keilor and the surrounding areas. Features that support housing growth include good access to open space, an established Neighbourhood Activity Centre and existing schools and community facilities. This area is also home to the recently completed Brimbank Aquatic and Wellness Centre and is slated for the development of a new train station in Keilor East.

Figure 20: Summary of key opportunities



4.3 Housing Growth Constraints

Constraints are those factors which may limit the ability or suitability of residential land to accommodate future housing growth. PPN90 notes that these areas '*tend to have overlays that reflect neighbourhood, heritage, environmental or landscape characteristics or other physical constraints which may impact their capacity for change*'. Constraints can include:

- > Environmental constraints, such as flooding, topography or significant vegetation.
- > Constraints from other land uses, which may require buffers or separation distances to manage safety and/or amenity conflicts, such as industrial areas, airports and major infrastructure.
- > Built form constraints, such as areas with a special neighbourhood character or heritage features.

PPN90 also clarifies those matters that *do not* constitute constraints, including remoteness from activity centres and transport (which was a key determinate of housing growth in *Home and Housed*), and restrictive covenants.

Understanding, and then ultimately determining the relative impact of these constraints on housing growth, is a key challenge for this Project. The Housing Strategy and RDF will need to carefully weigh the impact of a particular constraint (or set of constraints, as the case may be) against any potential opportunities for growth, taking into consideration a range of strategic policy objectives that may influence the most appropriate use of a particular piece of land. Following this, planning policy will need to provide clear direction regarding the preferred use of the land, in order to support that identified use. While this approach will provide certainty regarding the preferred level of growth for residential land, taking into consideration known surrounding land uses and existing policy direction, where a land use conflict already exists it may not be the case that this Project will be able to resolve it. This is particularly the case with non-residential land. As the Project scope relates only to residential land, it will not be able to consider the rezoning of non-residential land.

The first step towards understanding constraints on housing growth is identifying the types of constraints that exist and how these are expressed spatially.

Brimbank's key constraints are mapped and discussed below.

Industry + Industrial land, Including Buffers and Separation Distances

Brimbank's industrial areas are an important feature of the local, regional and Victorian economy, and they play a key role in supporting local jobs and employment opportunities. There are approximately 2,083 ha of industrially zoned land, including land of State and regional significance.⁵¹ The role and function of Brimbank's industrial land is established by *Plan Melbourne*, the *Melbourne Industrial and Commercial Land Use Plan 2020* and the *BILS*. These are supported by local planning policy, and through the application of Industrial Zones and the Commercial 2 Zone, as shown in Figure 21, and described below:

- > **Industrial 1 Zone** – Manufacturing industry, storage and distribution of goods and associated uses in a manner which does not affect the safety and amenity of local communities.
- > **Industrial 2 Zone** – Manufacturing industry, storage and distribution of goods.
- > **Industrial 3 Zone** – Used to avoid inter-industry conflict, by providing a buffer between the Industrial 1 Zone or Industrial 2 Zone and local communities.
- > **Commercial 2 Zone** – Commercial areas for offices, appropriate manufacturing and industries, bulky good retailing, other retail uses, and associated businesses and commercial services.

Maintaining the economic viability and supporting the ongoing operation of industrial uses within significant industrial land is a key objective of State and local planning policy. To support these objectives, the *BILS* and planning policy are clear that the location of new housing should not undermine the continuing operation of industrial uses. In particular, Clause 17.03-2S – *Sustainable industry* and Clause 17.03-3S – *State Significant Industrial Land* are clear that new housing should not be located near existing industry.

Relevantly, Clause 13.07-1S – *Land use compatibility*, seeks 'to protect community amenity, human health and safety while facilitating appropriate commercial, industrial, infrastructure or other uses with potential adverse off-site impacts'. It applies broadly to any appropriate commercial, industrial or other use (i.e., not just significant industrial land) and to new sensitive land uses. Clause 13.07-1S is supported by strategies that (amongst other things) direct decision makers to 'avoid locating incompatible uses in areas that may be impacted by adverse off-site impacts from commercial, industrial and other uses'. EPA Publication 1518, *Recommended separation distances for industrial residual air emissions*,⁵² is included at Clause 13.07-1S as a policy document that should be considered as relevant.

Unlike policy relating to significant industrial land, including Clause 17.03-2S and Clause 17.03-3S, the 'agent of change' principle is embedded in Clause 13.07-1S. This means that where new housing is proposed in areas that may be impacted by adverse off-site impacts, the onus is on those residential land uses to reduce any amenity impacts. Where new commercial, industrial or other uses with potential off-site impacts may impact existing residential uses, these impacts should be minimised through '...land use separation, siting, building design and operational measures'.

EPA Publication 1518 provides recommended minimum separation distances; however, these minimum distances may be varied based on a site-specific risk assessment.

Additionally, threshold distances for specific uses and activities are listed at Clause 53.10 – *Uses and activities with potential adverse impacts*. The purpose of this provision is 'to identify those types of uses and activities, which if not appropriately designed and located, may cause offence or unacceptable risk to the neighbourhood' and it encompasses a broad range of potential off-site impacts. Unlike the separation distances of EPA Publication 1518, where the 'agent of change' could be either a new proposed sensitive use or a new or expanded industrial use, the requirements of Clause 53.10 only apply to an application to use land for an industry, utility installation or warehouse for a new or expanded industrial use.

At present, no land use buffers have been formalised in Brimbank using the Buffer Area Overlay (BAO)—a new planning tool introduced to identify areas where unintended off-site impacts may occur. PPN92 – *Managing buffers for land use compatibility* notes that an understanding of the nature of potential off-site impacts from each industrial use (noise, dust, odour etc.) is necessary to enable planning authorities to define the type of planning responses (zones and other planning tools) required to manage conflicts. PPN92 emphasises that strategic planning should prioritise avoiding land use conflict, and that sensitive uses

⁵¹ For example, land within the Western State Significant Industrial Precinct.

⁵² EPA 2013, *1518: Recommended Separation Distances for Industrial Residual Air Emissions – Guideline*, EPA Victoria website, accessed 20 Feb 2023, <https://www.epa.vic.gov.au/about-epa/publications/1518>.

(including housing) and future urban growth should be directed away from areas that may be affected by off-site impacts. The extent and impact of off-site impacts vary and the applicable buffers, separation distances, and/or threshold distances⁵³ are defined based on the specific activities conducted on the land. Determining the extent of off-site impacts—and therefore the extent to which different industrial areas are a constraint on housing growth—is complex.

Given this context, it would be challenging for this Project to identify all existing operations across the municipality that may attract a separation distance and then, to undertake a site-specific assessment to determine that distance for each individual operation. Practically speaking, Council does not have the expertise to source or assess this type of information, noting that it is often commercially sensitive, requires permission from the industrial operator to obtain and there is no one single source of information.

While the general approach to reducing land use conflict established by Victoria's planning framework relies on the 'agent of change' principle, it is not considered that this would be invoked in the context of a municipal wide housing strategy. This is consistent with the approach adopted by Hobson's Bay in Amendment C131, which implemented their RDF and identified residential areas surrounding significant industrial land and Major Hazard Facilities (MHFs) for minimal change.

Table 7 identifies those land uses and/or infrastructure that may pose a constraint on residential growth. Not all of these will pose the same level of constraint and the appropriate planning response for each may be quite different.

Finally, it is noted that in December 2022, the EPA released new draft guidance⁵⁴ intended to replace the existing Publication 1518 and support decision makers to direct land use and development to the most appropriate locations based on the level of risk. Under this new draft guideline, many of the recommended minimum separation distances are proposed to change.

Major Hazard Facilities

The Elgas and Hexion sites in Deer Park are classified as MHFs in accordance with the *Occupational Health and Safety Regulations 2007* and are licensed by WorkSafe Victoria.

Clause 13.07-2S - *Major hazard facilities*, requires this Project to 'consider the risks associated with increasing the intensity of use and development within the threshold distance of an existing major hazard facility'. In accordance with Ministerial Direction No.20 of the *Planning and Environment Act 1987*, Council is also required to consult with WorkSafe and consider their advice in relation to strategic planning projects in proximity to such facilities.

The current advisory areas that apply to each of these sites extend up to 1,000m. This differs from previous advice received at the time *Home and Housed* was being implemented. During preliminary discussions with WorkSafe as part of this Project, they have indicated that within these advisory areas, any intensification of sensitive uses should be discouraged.

This is likely to impact the designation of housing growth areas as part of this Project.

Contaminated and potentially contaminated land

Given the significant and ongoing contribution that industry has had to the economic, social and physical development of Brimbank, it is a reality that areas of the municipality are either 'contaminated', 'potentially contaminated' or 'may be potentially contaminated'. This is similar to other municipalities in metropolitan Melbourne that have industrial legacies. In this metropolitan context, and across Victoria more broadly, the existing planning and contaminated land regulatory framework provides a sound context from within which to appropriately manage risk while encouraging appropriate housing growth. This framework comprises:

- the *Planning and Environment Act 1987*
- *Ministerial Direction No. 1 – Potentially Contaminated Land*
- *Planning Practice Note 30 – Potentially Contaminated Land*

⁵³ The terminology varies depending on the document or policy and can mean slightly different things.

⁵⁴ EPA 2022, *Guide to Separation distance and landfill buffer changes: Publication 1949*, EPA Victoria website, accessed 20 Feb 2023, <https://engage.vic.gov.au/separation-distances-and-landfill-buffers>.

- the Victoria Planning Provisions, including *Clause 13.04-1S – Contaminated and potentially contaminated land*; *Clause 45.03 – Environmental Audit Overlay*; and *Clause 65.01 – Decision guidelines*; and
- the Environment Protection framework, including the *Environment Protection Act 2017* and *Environment Protection Regulations 2021*.

For the purposes of this Project, the constraints to housing growth that may exist due to contaminated and potentially contaminated land should be considered in the context of the wider landscape of available legislation and the existing framework, outlined above. It is also noted that the Project scope is confined to existing residential land and does not propose to rezone any existing industrial land.

Amendment c212brim was gazetted on 21 September 2022. This applied the EAO to land that formed part of the closed City of Sunshine and Hulett Street landfills (now known as Energy Park and Carrington Drive Reserve) and adjoining land, which may be potentially contaminated due to past activities associated with landfill operations and remediation, as well as the former landfill itself. Some of the adjoining land impacted by the amendment is residentially zoned and contains existing residential development dating back to the 1970s (i.e., several lots on Denton Ave, Toora Court and Karen Place, St Albans). Consideration of the potential for residential densification on sites impacted by these former landfills will be required as part of the Housing Strategy.

Existing EAOs, including land affected by c212brim are mapped in Figure 21.

Pipelines

In Victoria, licensed pipelines are regulated in accordance with the *Gas Safety Act 1997*, *Pipelines Act 2005* and *Gas Industry Act 2001*. Pipeline operators must also meet the requirements of *AS 2885 The Standard for Gas and Liquid Petroleum Pipelines*. There are two licensed pipelines in Brimbank: the Exxon Mobil jet fuel pipeline, and a (high pressure) transmission gas pipeline that extends across the southern portion of the municipality and then north, to Sunshine.

In accordance with *AS 2885*, residential uses surrounding a pipeline may be classed as either T1 (low density) or T2 (high density). Where new sensitive uses are proposed, or existing residential uses are proposed to be intensified in a manner that would change their classification from a T1 class to T2, the relevant pipeline operator should be consulted. This, coupled with *Clause 19.01-3S – Pipeline infrastructure*, which seeks to '*recognise existing transmission-pressure gas pipelines in planning schemes and protect them from further encroachment by residential development or other sensitive land uses, unless suitable additional protection of pipelines is provided*' means that Brimbank's existing pipelines may present a constraint to housing growth.

However, in a practical sense, the level of constraint is largely determined on a case-by-case basis in consultation with the relevant pipeline operator, considering the relevant factors at a particular point in time. For the purposes of recognising the potential constraints on housing growth as part of this Project, the pipelines have been mapped in Figure 21. There are large areas of land around Sunshine where the pipeline is located that are currently zoned to support high density, sensitive uses.

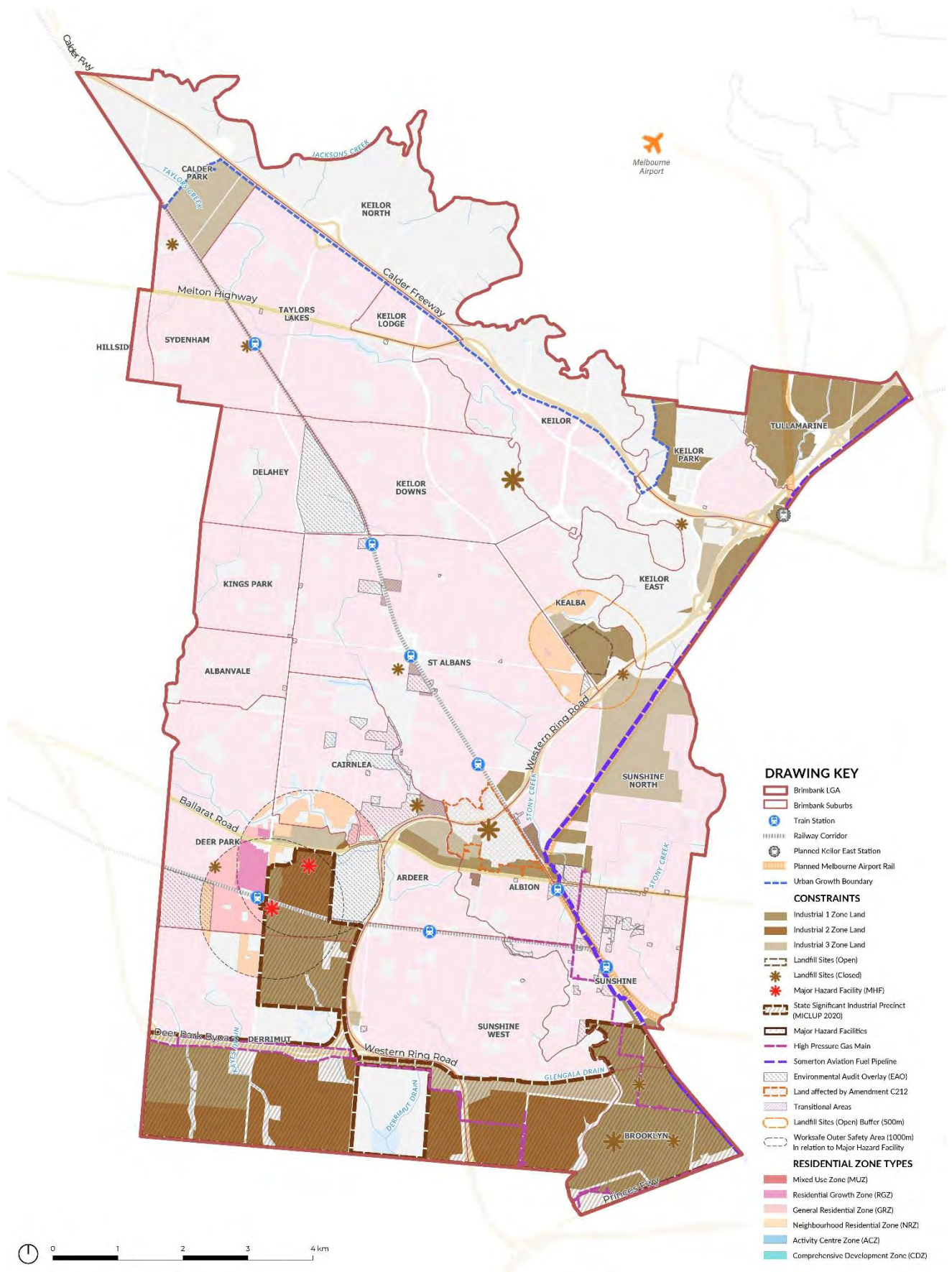
Transitional Areas

Transitional areas identified in the *BILS* are shown in Figure 21. Transitional areas are currently zoned for industrial land uses but in the long term may be suitable for other uses, subject to further strategic work, which does not fall within the scope of this Project. Given their existing industrial zoning, transitional areas are identified and mapped as a constraint, as they are currently not suitable for housing growth. However, they arguably present less of a constraint than land in the Industrial 2 Zone, where the long-term, strategic policy objective is to support industrial uses. This determination will ultimately be made by the RDF.

Table 7: Buffers/separation distances/threshold distances

Area	Indicative buffer, separation of threshold distance	Comments
MHFs: Elgas Limited 16 Radnor Drive Deer Park Hexion Pty Ltd 765 Ballarat Road Deer Park	1000m (Outer Safety Area)	New sensitive uses/intensification of sensitive uses within this safety area is discouraged by WorkSafe Victoria.
Industry (air, dust and odour emissions)	Variable (typically between 250–1,000m)	These minimum distances may be varied (reduced or expanded) based on a site-specific risk assessment.
Landfill sites (open) Sunshine landfill site at Kealba (Barro Group) – Barro Group licence cancelled Feb 2023.	Type 2 landfills: 500m	Buffer applies to ‘buildings and structures’ rather than land use. Other guidelines may apply regarding off-site impacts, including odour.
Landfill sites (closed)	Type 2 landfills: 500m Type 3 landfills: 200m	Buffers as above (open landfills). Amendment C212brim applied the EAO to several properties which were identified as forming part of the closed Sunshine Landfills, and/or its operations. As part of that process, it became apparent that some properties within the Amendment boundary have part of the former quarry hole within their property boundary. This constraint was highlighted in the Environmental Audits used as strategic justification for the amendment. The GRZ applies to these properties. There may be a conflict between the development outcomes sought for the GRZ and the constraints on the land. This will need to be reviewed as part of the next stage of this Project.
Industry (those listed at Clause 53.10 of the Brimbank Planning Scheme)	Variable (typically between 100–1,000m)	Where the default buffer is not met, or is indicated as being case specific, a referral to the EPA is triggered.
Pipelines Somerton Aviation Fuel (ExxonMobil) High Pressure Gas Main (Ausnet Services)	Aviation fuel: 200m Gas: 200-400m	Varies depending on several factors including the existing land use context, the nature of the risk associated with a rupture, the diameter of the pipe, burial depth, condition etc. It is noted that the aviation fuel pipeline is proposed to be relocated in some parts around the Sunshine MeAC.
Environmental Audit Overlay (EAO)	No buffer	Applies to land that is potentially contaminated and requires further investigation before a sensitive use may commence. The impact of the EAO on residential development is determined on a case-by-case basis.

Figure 21: Potential areas of constraint from industry and other uses/facilities



Melbourne Airport

The Melbourne Airport Environs Overlay (MAEO), seeks to protect the operation of Melbourne Airport and affects residential areas in the northern and eastern parts of Brimbank. This overlay implements State and regional policy objectives (Clause 18.02-7S and 18.02-R) to strengthen the role of Victoria's airports and to safeguard their ongoing, safe and efficient operation. Melbourne Airport is identified as a major domestic and international airport with no curfew and 24-hour access. The Victorian Government is leading airport safeguarding and will implement changes into the Victorian Planning Provisions to ensure a consistent approach across all councils.

State policy requires that areas where the capacity or long-range noise modelling indicates an N Contour ('number above' contour) of a certain decibel (db(A)) should be planned in a way that reduces the impact of aircraft noise.

The MAEO addresses this for the current airport operation, by identifying land that is or will be subject to high (MAEO1) or moderate (MAEO2) levels of aircraft noise and limits dwelling density in those areas. This is a substantial constraint to housing growth in these areas.

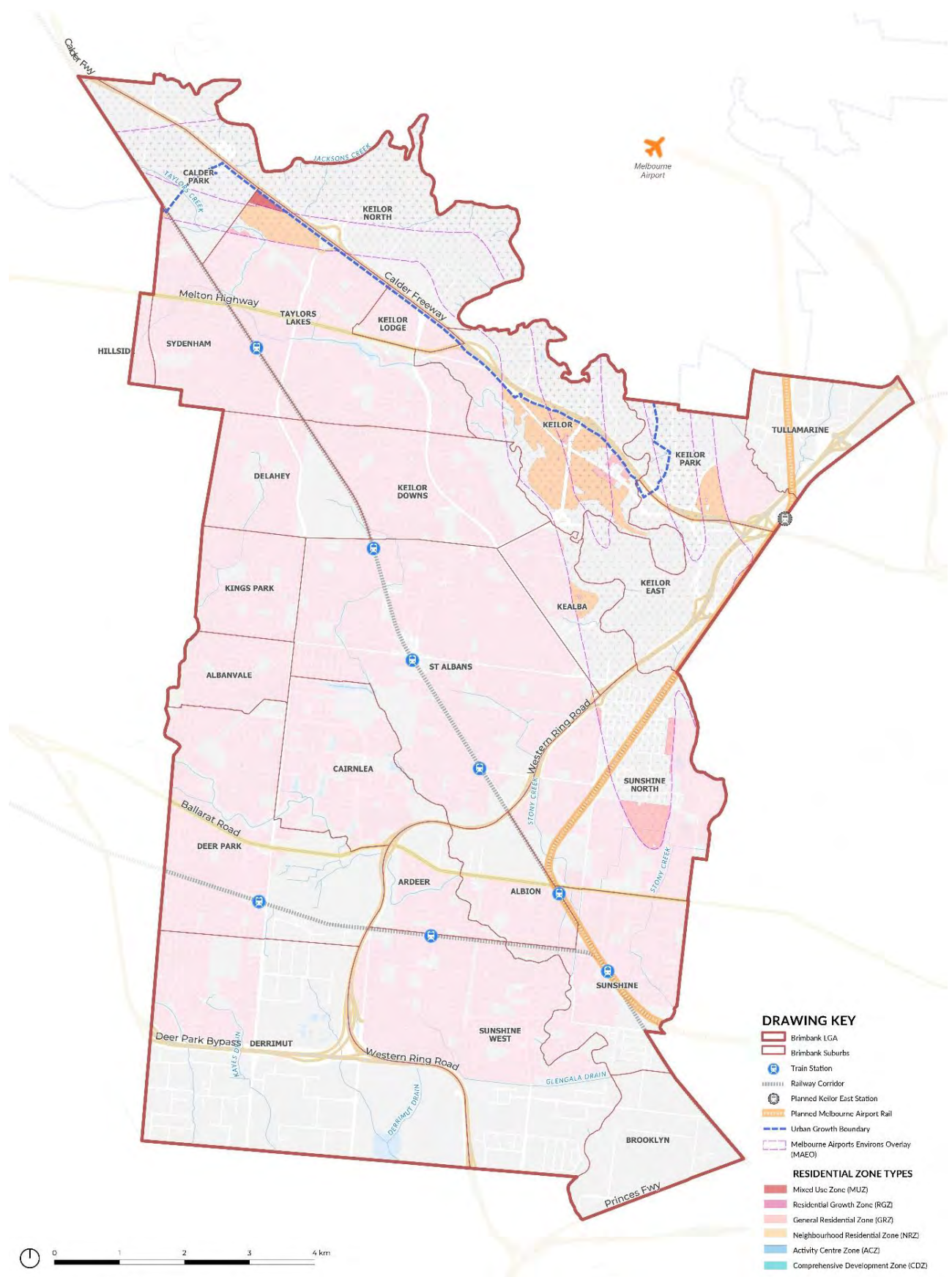
The Melbourne Airport Masterplan 2022 (approved in November 2022)⁵⁵ proposes a four-runway configuration and confirms that the north-south runway will be the next runway delivered. A draft Major Development Plan (MDP) for the third runway was presented to the community for consultation in February to May 2022. This MDP is required to be approved by the Commonwealth Minister before it can be delivered.

If approved, the north-south runway is likely to further impact parts of Brimbank when it opens in 2027 (estimated date). Keilor, Keilor Park, Keilor Village and Kealba, are likely to be most impacted, but the full scale and extent of the impact is currently uncertain.

For the purposes of understanding existing constraints on development, the existing MAEOs have been mapped. However, the Project will consider any potential further constraints posed by Melbourne Airport when considering housing growth options.

⁵⁵ Melbourne Airport 2022, *2022 Melbourne Airport Master Plan*, Melbourne Airport website, accessed 20 Feb 2023, <https://www.melbourneairport.com.au/Corporate/Planning-projects/Master-plan>.

Figure 22: Melbourne Airport Environs Overlay



Road and Rail – Barriers + Amenity Impacts

Brimbank is traversed by major roads, highways, freeways and rail corridors. This transport infrastructure presents opportunities but can be a limiting factor for housing intensification where there are substantial noise, dust, odour and air pollution impacts.

The *Transport Priorities Paper 2022* acknowledges how the effective planning and design of the Brimbank transport network will play a fundamental role in the creating a liveable and sustainable community.

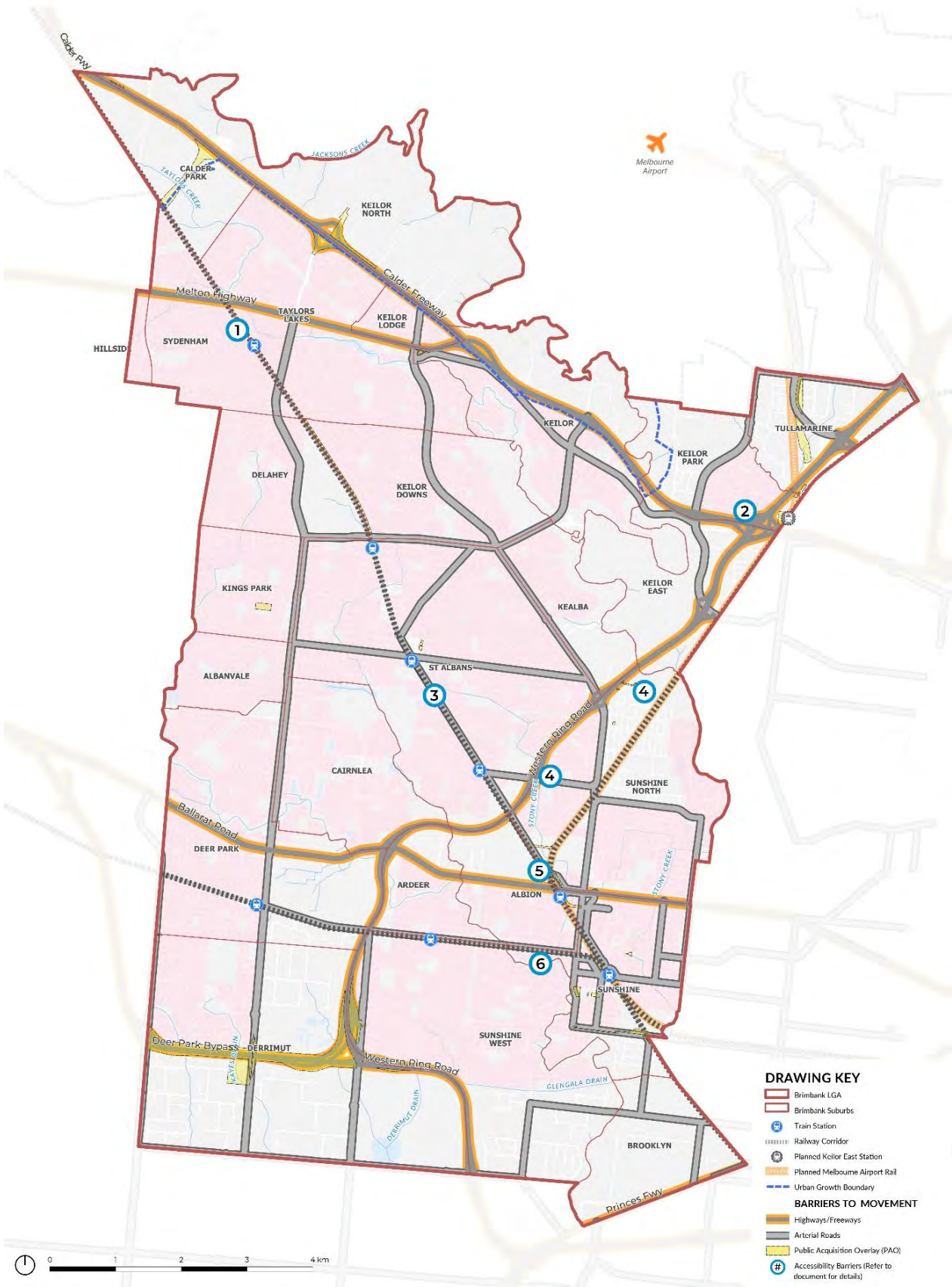
Clause 13.05-1L seeks to ensure that noise attenuation is incorporated into residential development that is affected by the Calder Park Raceway, is close to activity centres or is located along the proposed Melbourne Airport Rail. A small pocket of residential land adjacent to the Western Ring Road in Ardeer is affected by the DDO4 which seeks to ensure that development is undertaken with appropriate noise attenuation measures to minimise the impact of traffic noise.

Major transport corridors can also present as a barrier to pedestrian and cycle movement and are a limiting factor particularly in proximity to activity centres, where denser housing is typically encouraged.

Accessibility barriers include (and are shown on Figure 23):

1. **Sydenham** – Sunbury Line is a barrier between residential areas and Watergardens Shopping Centre in the north-east. Kings Road provides inconsistent and disconnected on-road cycle lanes for north bound traffic only, limiting southern accessibility. At a local level Overton Lea Blvd limits east-west connectivity.
2. **Keilor Park** – The Calder Freeway and Western Ring Road isolates Keilor Park from the surrounding area.
3. **St Albans** – The Sunbury Line is a barrier to east-west accessibility, particularly in the north of St Albans.
4. **Sunshine North** – The Western Ring Road and freight rail line is a barrier between residential areas. The Western Ring Road also creates an accessibility barrier to St Albans and the Sunshine Hospital. Ballarat Road limits connectivity to Sunshine MeAC.
5. **Albion** – Both the Sunbury Rail line and recently upgraded Anderson Road are a barrier to east-west movement to Sunshine MeAC.
6. **Sunshine West** – Limited road connectivity east over Kororoit Creek limits both pedestrian and cyclist movements and connectivity to Sunshine MeAC. The Ballarat and Ararat Rail Line in the north impacts northern accessibility into Ardeer.

Figure 23: Road and rail barriers



Aboriginal Cultural Heritage Sensitivity, Special Character Areas + Heritage

The northern part of Brimbank is identified as Wurundjeri Land, and the southern part Bunurong Land. The north of Brimbank lies within the area occupied by the Kurung-Jang-Balluk and Marin-Balluk clans of the Wurundjeri people also known as the Woiwurrung language group, who form part of the larger Kulin Nation. Other groups who occupied the land in the area include the Yalukit-Willam and Marpeang-Bulluk clans.

Areas of known Cultural Heritage Sensitivity are mapped in Figure 24. These areas are primarily located along waterways and may present a constraint to development as determined on a case-by-case basis. However, outside of known areas of significance in places such as the River Valley estate, it is unlikely that Areas of Cultural Heritage Sensitivity will present a major constraint to housing growth in Brimbank.

The HO identifies places of natural or cultural heritage significance. And seeks to ensure that *development does not adversely affect the significance of heritage places*.

In areas identified for substantial change, the HO is a constraint on development and is viewed as a policy conflict. PPNs90 and 91 recommend NRZ be applied to areas affected by the HO.

Relevantly, the HO applies to select residential areas in Sunshine and Albion that are close to the Sunshine MeAC and exhibit many features that would otherwise support housing growth.

To the west of Sunshine Station, most heritage places identified by the HO are within the NRZ. However, to the east of the station, the HO151, HO150 and HO116 applies to land in the RGZ and creates a policy conflict. This conflict will need to be addressed in the RDF.

A valued characteristic of the Albion and Sunshine areas are the street layouts and subdivision patterns. These are associated with the historically significant housing estates built for factoryworkers by H.V. McKay from the late 1890s to the post-World War II period and reflect town planning theories such as the Garden City movement. Some areas are protected via the HO, however, there are several streets with uniquely intact examples of typical housing from the era that are not subject to the HO. Where no HO applies, planning for these areas may include additional planning controls such as a Neighbourhood Character Overlay where it can be strategically justified that the zoning schedule alone will not achieve intended neighbourhood character outcomes; however, this has not been seen as justified in the past (for further information see Section 5.2 'Albion Neighbourhood Plan').⁵⁶

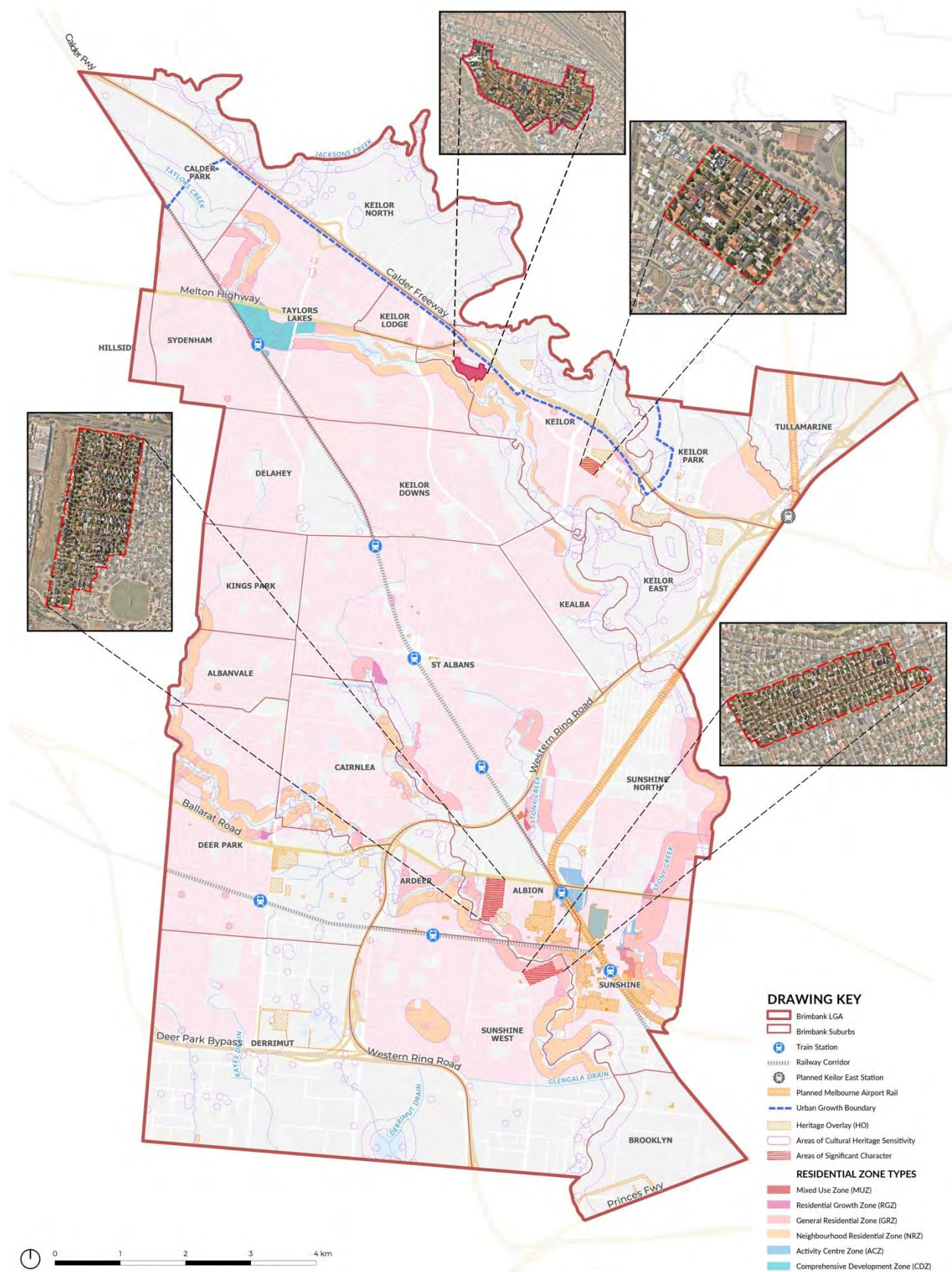
The Neighbourhood Character analysis undertaken (refer to Section 5) has identified several areas of intact neighbourhood character that may be suitable for protection. While these areas do contain some contemporary built forms, the extent to which they exhibit a particular character may warrant greater protection under the planning scheme. However, this will also limit their future development and impact upon other desired direction for housing growth. The extent to which these areas present a constraint to housing growth will be balanced in the RDF.

These areas are in:

- > **Albion** – Streets to the west of Perth Avenue.
- > **Keilor** – Streets which run south-west from Old Calder Hwy to Church Street, west of Green Gully Road.
– Petrik Drive.
- > **Sunshine West** – Korowa, Kosky, Killara Streets and immediate surrounds.

⁵⁶ Note: The NCO cannot apply to HO areas.

Figure 24: Heritage Overlay and areas of significant character



Environmental Constraints

Brimbank has relatively few environmental constraints. The Land Subject to Inundation Overlay (LSIO) applies to the key waterways, such as the Maribyrnong River, Taylors Creek and Kororoit Creek and affects some residentially zoned land. In these cases, a proposal is often required to incorporate setbacks and design responses that can limit development.

The Special Building Overlay (SBO) applies to land that is liable to inundation by overland flows from the urban drainage system and triggers a permit requirement for buildings and works.

The SBO affects land in Sunshine, Sunshine West and St Albans that may be appropriate locations for housing growth. The SBO does not necessarily present a constraint to housing growth, where buildings are designed in accordance with the purpose of the Overlay.

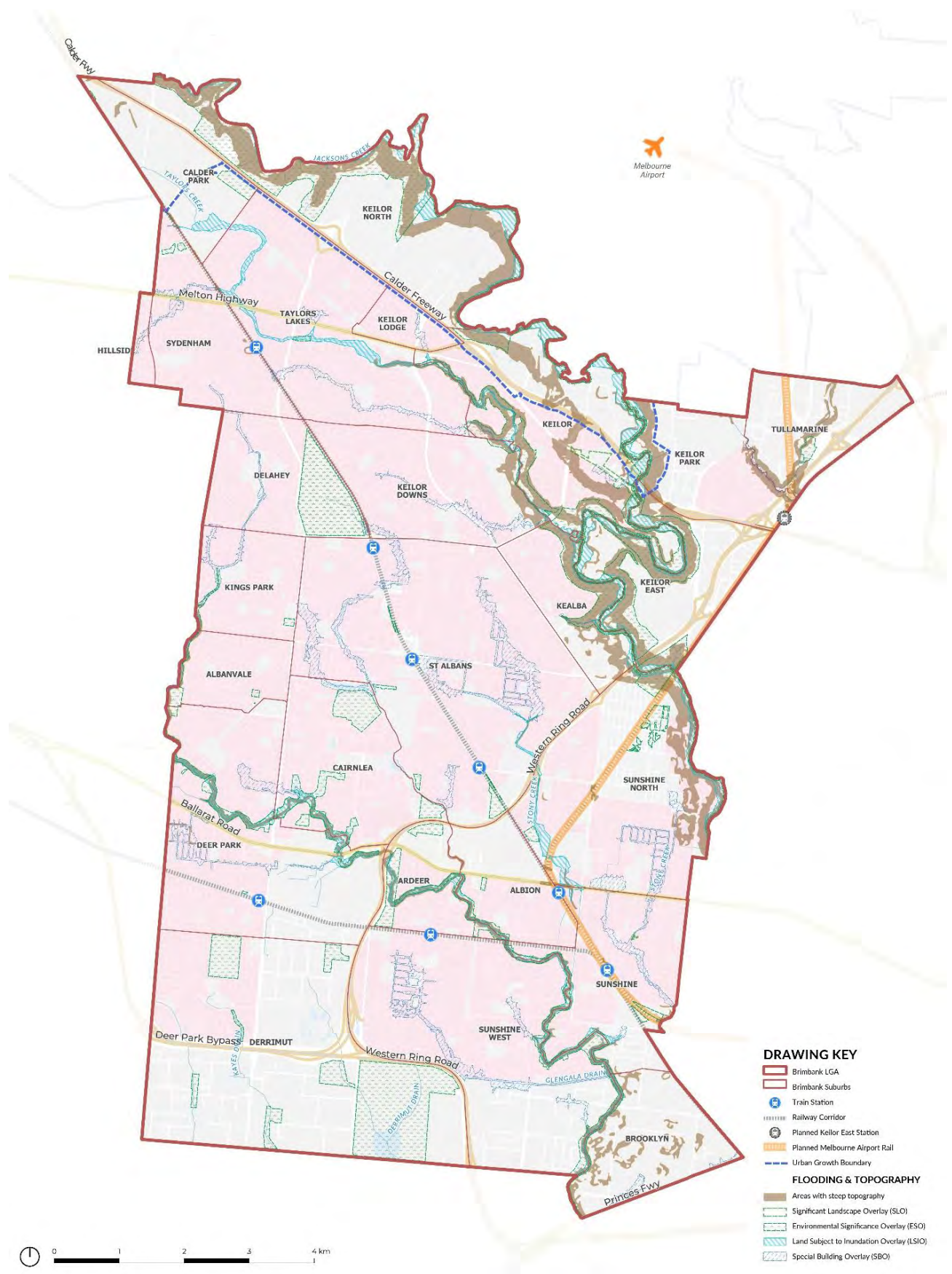
Several ESOs are used throughout the municipality to identify areas where development may be affected by environmental constraints and SLOs are used to identify significant landscapes. For the most part, ESOs and SLOs do not directly apply to residential land, however, the significance of these features are relevant considerations when planning for abutting land.

The following areas may present some constraints to development:

- > ESO1 applies to significant grasslands and ESO2 applies to significant volcanic eruption points on the 250A Taylors Road, Delahey, which has been identified as a potential redevelopment site subject to further strategic work to support at PSA. Flora and fauna impacts, and geomorphological considerations, would need to be resolved for this site as part of any redevelopment proposal.
- > ESO5 and SLO3 apply to the Maribyrnong River (or parts) and ESO4 applies to the Kororoit Creek, incorporating objectives and guidelines to ensure development is not visually prominent or intrusive when viewed from the creek/river corridor and to minimise development impacts on the corridors. While these overlays primarily apply to public land in the river and creek corridors, there are some small anomalous areas that affect residential land (e.g., Boreham Street and Dundalk Street in Sunshine).

In general, topography is not a major constraint on development in Brimbank. Most of the municipality is relatively flat, except for steeper areas around the Maribyrnong River. Some residential areas in Sunshine North and Keilor require development to make use of large retaining walls and specific housing designs in order to respond to topography.

Figure 25: Flooding and topography



Summary of Key Constraints

Key constraints have been overlapped in a 'heat map' to demonstrate where they are most concentrated (refer to Figure 26). Some layers present greater constraints for housing growth and change than others and these will be considered carefully when preparing the Housing Strategy. These constraints will also need to be carefully balanced with the opportunities for housing growth summarised in the previous section of this Background Report.

Sunshine (and surrounds)

Constraints in Sunshine are mainly related to potential impacts from industrial areas, or large-scale infrastructure, such as gas pipelines. These constraints are not all equal and further consultation and analysis will be undertaken as part of the Housing Strategy to determine the most appropriate way to address these matters.

Sunshine has a long history of industrial and residential interfaces, and it is to some extent an important part of the area's identity. As an area that also exhibits many opportunities for housing growth, it will be necessary to carefully manage potential land use conflicts and give clear direction about preferred locations for growth.

Sunshine and Albion's heritage significance (as recognised by the HO) will limit the ability of some areas to accommodate substantial change. In accordance with PPN guidance, it is likely that land affected by the HO will be identified for minimal change in order to reduce policy conflict.

St Albans (and surrounds)

The primary constraint in St Albans relates to the overlapping influence of a range of industrial uses, EAOs and other potential constraints related to land use conflict. Like Sunshine, St Albans presents opportunities for housing growth, and as such, will need to be carefully balanced against known constraints in the Housing Strategy.

Sydenham and Taylors Lakes (and surrounds)

Sydenham and Taylors Lakes areas are relatively free from significant constraints, except for some small residential areas affected by the MAEO. The key constraint in these areas relates more to barriers to movement, particularly walking and cycling.

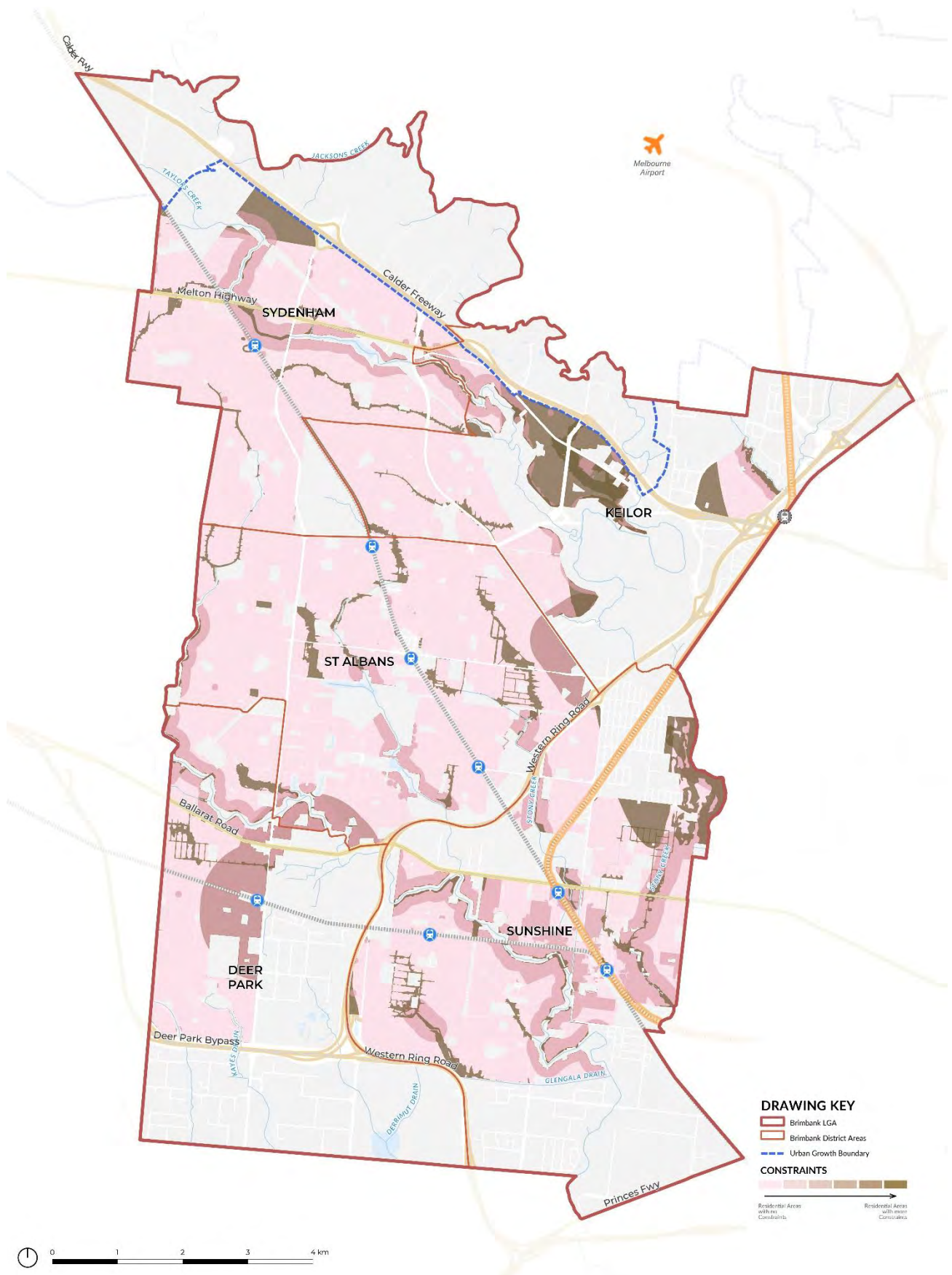
Deer Park (and surrounds)

Deer Park and surrounds is located adjacent to industrial areas, with a range of potential buffer constraints, and is also constrained by large scale barriers to movement such as freeways, rail and major roads, which also present amenity challenges. The MHF will limit opportunities for housing growth within the Safety Area.

Keilor (and surrounds)

Housing growth in Keilor and surrounds is constrained primarily by the MAEO, and to a lesser extent by topographical challenges and amenity and barrier constraints imposed by large scale road infrastructure.

Figure 26: Summary of key constraints



4.4 Summary of Findings

- > **Effectiveness of zones:** The current planning framework is not achieving the level of housing growth and diversity envisaged by *Home and Housed*. The Housing Strategy will need to consider how to strengthen direction on preferred locations for housing growth, to encourage the right type of housing in the most appropriate locations. This will need to be supported by zones that reflect the level of housing change envisaged.
- > **Housing supply:** There is sufficient theoretical capacity within existing neighbourhoods to meet Brimbank's projected housing needs, regardless of which population projection scenario is used (VIF or .id). However, the lack of greenfield sites, and slow delivery of apartment developments means most housing growth will occur as infill development in established neighbourhoods. Clear guidance on preferred infill development outcomes will need to be established to support the ongoing delivery of new housing.
- > **Housing diversity:** Brimbank's demographic and household profile is changing, generating a need for different housing types, particularly smaller, more accessible, and more affordable housing. Existing dwelling stock is not very diverse and is predominantly separate houses. While this aligns with current market preferences for a segment of the population, it is not meeting the needs of single person households. The Housing Strategy will need to increase housing diversity and, in particular, encourage the delivery of one- and two-bedroom dwellings in appropriate locations.
- > **Viability of high density housing:** Sunshine MAC has substantial capacity to accommodate housing growth in the form of high density development, such as apartments. However, this is yet to occur at scale. Significant public sector investment will improve the viability and attractiveness of this type of housing in the medium term in and around activity centres. The Housing Strategy will need to anticipate this, with the appropriate use of the RGZ to encourage high density housing.
- > **Housing affordability:** Housing in Brimbank is becoming increasingly unaffordable, and there is projected to be an increasing shortfall of Affordable Housing in the future without substantial intervention. The Housing Strategy will need to encourage the delivery of affordable housing.
- > **Household types:** household sizes and types are changing across Brimbank, with an increasing proportion of couples and lone person households. This, coupled with an ageing population will require a variety of housing forms, including smaller homes, retirement living, aged care, and dwellings suitable for multi-generational households. The Housing Strategy will need to provide clear direction on the preferred locations for a variety of housing types.
- > **Housing growth opportunities:** key areas of opportunities for housing growth are located around the Sunshine/Albion and St Albans activity centres, and to a lesser extent, in Sydenham (around Watergardens). The viability of medium and high density development in and around the northern activity centres (i.e., in the form of apartments) will likely be a longer term proposition given market conditions and less high profile infrastructure investment than Sunshine/Albion. The Housing Strategy's role will be to direct housing growth and diversity with more effectiveness to areas that are accessible and liveable.
- > **Housing growth constraints:** Key constraints on housing in Brimbank relate primarily to potential land use conflict (e.g., industrial uses and MHFs) and areas of heritage. These constraints are concentrated in the southern parts of the municipality, including around Sunshine and Deer Park. Areas of opportunity and constraint for housing growth often overlap and will need to be carefully balanced in the RDF.

5. NEIGHBOURHOOD CHARACTER INFLUENCES

Neighbourhood character is the cumulative impact of public and private realm features that establish the character of a place or area. Neighbourhood character describes how the interplay of these features gives an area a distinct look and feel.

5.1 Drivers of Neighbourhood Character

When planning for housing growth, the Victorian planning system requires consideration of neighbourhood character. This is largely achieved through use of the residential zones, as follows:

- > The NRZ seeks to **ensure** that development **respects** identified neighbourhood character and allows for **neighbourhood character objectives** to be defined in the schedule.
- > The GRZ **encourages** development that respects neighbourhood character and allows for **neighbourhood character objectives** to be defined in the schedule.
- > The RGZ seeks to **ensure** that residential development achieves **design objectives** specified in the schedule.

Neighbourhood character is not static and as areas grow and develop, incremental or substantial changes can lead to the emergence of a new character.

To define a future preferred character for Brimbank's varied neighbourhoods, the existing neighbourhood character needs to be identified first.

This chapter, and Appendix 7.13 document the existing character of Brimbank's neighbourhoods. The analysis does not define a preferred character just yet. Instead, the analysis will be used as an input into the Neighbourhood Character Strategy, the Housing Strategy, and ultimately, the RDF, where neighbourhood character objectives will be balanced with housing growth objectives to establish a framework that meets Brimbank's housing needs.

To document existing character across Brimbank, we have identified three types of influences:

- > **Planning Influences:** These are the planning policy frameworks that influence decision-making and shape development and character outcomes. Planning influences have been informed by analysis of policy, observation of on the ground development outcomes and analysis of decision-making at VCAT.
- > **General influences:** These are the overarching factors unique to Brimbank that influence the pattern of development across the municipality. These include things such as the era of development, lot sizes and interfaces between housing and natural features (e.g., creeks and rivers). These general influences have been informed by a combination of desktop analysis and site inspections.
- > **Contributors and threats to character:** These are the features and characteristics that we have observed that either contribute to the character of certain areas, or that present emerging threats to that character. These contributors and threats have been distilled from detailed site inspections of each of Brimbank's suburbs (refer to the Suburb Profiles in Appendix 7.13 for further detail on each suburb).

Each of these is discussed in turn below.

5.2 Planning Influences on Character in Brimbank

PPF and Planning Practice Notes

Clause 15.01-5S and PPN90 provide clear direction that recognition and protection of neighbourhood character need to be considered in the context of levels of housing change that are expected (as directed by the Housing Strategy).

PPN43 provides guidance on how to consider neighbourhood character in planning permit applications. However, it is also recognised as relevant for preparing neighbourhood character studies.⁵⁷ The matters identified by PPN43 for consideration, and the terms/features it suggests for describing neighbourhood character, have been used as the basis for analysis of neighbourhood character in this Project (refer Table 8).

The way these features 'present' in Brimbank is distinct from other municipalities. To ensure there is a shared understanding about how these features have been described in the context of Brimbank, this Project uses conventions for describing features such as setbacks, fencing, landscaping, era/type of development and building materiality, which are set out in Appendix 7.6.

Table 8: Neighbourhood character matters to be considered and features for assessment (Adapted from PPN43)

Neighbourhood Character Matters to be Considered	Features for Assessment
Pattern of Development	Locations, transitions & boundaries
	Private & public realm landscaping
	Street alignment, type and proportions
Built Form Scale and Character	Setbacks & site coverage
	Building types & height
	Lot size
	Fencing height, materiality, finish & transparency
	Garages, carports, crossovers, access & car parking
Architectural Styles and Roof Styles	Era of development
	Building materiality & quality
	Roof styles, materials & colours
Notable Features	Details of the footpath and street

⁵⁷ Glossop M 2019, *Peer Review Draft Brimbank Neighbourhood Character Study 2019*, Glossop Town Planning.

Planning Policy Framework

Local policy is a key consideration for Council's planners when making decisions on proposals for new development. Local policy that relates to neighbourhood character includes:

- > Clause 21.07-3 *Residential design*
- > Clause 21.06-1 *Heritage*
- > Clause 21.06-7 *Non-residential uses in residential areas*
- > Clause 21.06-3 *Escarpments and ridgelines*

These are discussed in more detail in Section 3.3.

The current LPPF seeks to ensure that new development works toward a preferred character in the RGZ and respects neighbourhood character in the GRZ and NRZ (Clause 21.07-3). However, as noted previously, guidance on what constitutes neighbourhood character for Brimbank's suburbs is absent, hampering effective decision-making and creating uncertainty for proponents.

The policy also creates confusion about the extent to which neighbourhood character is to be respected in the RGZ, presenting conflicts with the 'substantial change' expectations of the zone. This conflict has largely been removed in the new format PPF (Clause 15.01-5L), but there remains a lack of specific guidance on neighbourhood character and design objectives.

Further, under the new format Planning Schemes, the zone schedules—rather than local policy statements—are intended to be the main source of guidance.

This Project seeks to address this issue and fill any gaps in what constitutes neighbourhood character for different areas of Brimbank.

Home and Housed (Brimbank City Council, 2014)

Home and Housed, considers neighbourhood character at a high level; emphasising the need to protect suburbs from inappropriate development. Specifically, it has sought to protect neighbourhood character in Deer Park, St Albans, Sydenham, Keilor and Albion. *Home and Housed* did not identify special or intact neighbourhood character features of defined areas, suburbs or precincts, but it has been used to inform further consideration of the influences of character in Brimbank.

Home and Housed offered strategic justification for application of the residential zones and their schedules. The Schedules included:

- > Variations to ResCode standards that generally focussed on measures to enhance landscaping and open space provision.
- > Application requirements that sought more robust neighbourhood character analysis and design responses.
- > Decision guidelines that placed emphasis on neighbourhood character and landscaping considerations.

The schedules did not identify neighbourhood character or design objectives, as the format of the zones did not provide this opportunity at the time of implementation (2016).

The impact of these schedules on neighbourhood character outcomes is discussed in Section 1.1.

Draft Brimbank Neighbourhood Character Study (Mesh, 2019)

The Draft Brimbank Neighbourhood Character Study identified neighbourhood character precincts based on desktop analysis and site inspections, as contained within existing zone boundaries. This approach was adopted given that zone boundaries had been established in *Home and Housed*, and it reflected the growth and change expectations for each area at the time.

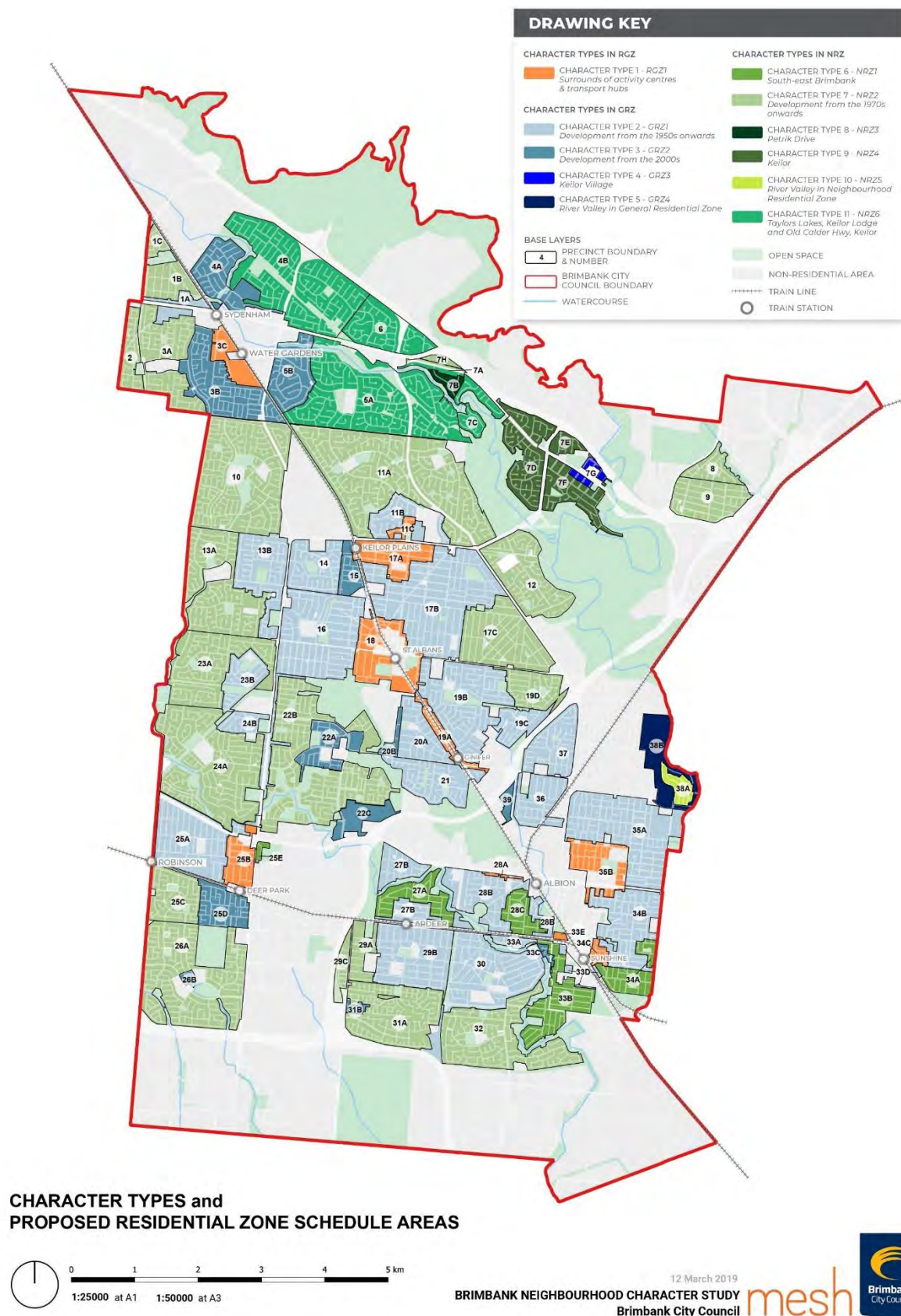
These precincts were then grouped into 11 Character Types based on commonalities in characteristics and preferred future character. A key outcome of the Study was recognition that large parts of the municipality demonstrate similarity in character features. Character Type 1 represented the RGZ, and the remaining 8 Character Types were defined based on more unique neighbourhood character features. A summary of the 11 Character Types is provided in Appendix 7.10.

The intent of the Neighbourhood Character Study was to inform changes and additions to the number and content of the zone schedules. The identified Character Types formed the basis for the recommended new zone schedules, which included proposed neighbourhood character objectives (for the GRZ and NRZ) and design objectives (for the RGZ), as well as new ResCode variations.

Due to the changed direction of PPN90 and 91, the Draft Neighbourhood Character Study could not be finalised.

The Draft Neighbourhood Character Study, along with the peer review of this Study, are now being used as inputs into this Project. The peer review of the Study found there to be further opportunity to consolidate character precincts where areas were identified by shared character features. Its recommendations have shaped and influenced the methodology adopted for this Background Report and will continue to factor into the approach to preparation of the Housing and Neighbourhood Character Strategies and the RDF.

Figure 27: Character types from the Draft Neighbourhood Character Study (2019)



Residential Zones

One of the key features of the reformed residential zones is the different maximum building height for each zone. The default maximum building heights of the zone apply across Brimbank (refer to Table 9), except for NRZ2, where a height limit of 12m applies and the GRZ2 where a four storey height limit applies.

Table 9: Maximum building heights of residential zones

Zone	Maximum building height
RGZ	4 storeys (can be increased by schedule)
GRZ	3 storeys (can be increased by schedule)
NRZ	2 storeys (can be increased by schedule)

In general, Brimbank's traditional housing stock (i.e., the original housing of the era of development) is generally single or double storey across all zones. Infill development in the NRZ and GRZ is predominantly single or double storey, with 2-3 storey development predominant in the RGZ (refer to the Suburb Profiles in Appendix 7.13 in the Appendices).

The GRZ's three storey height limit is an important consideration for this Project, particularly in areas where consistent lower heights are a valued character feature. At present, extensive three storey development in the GRZ is not a major threat to character, however, this is likely due to a combination of market conditions and lot sizes (lot sizes limit heights due to side setback requirements of ResCode). This Project will need to consider heights as part of the RDF. Where a lower height character is to be retained (2 storeys), the NRZ will be the appropriate zone.

Residential Zone Schedules

A schedule to the RGZ, GRZ and NRZ enables some key siting and amenity standards of Clause 54 and Clause 55 to be varied. A summary of the schedules in use in Brimbank is provided in Appendix 7.9.

The following provides an analysis of the impact of current residential zone schedules on neighbourhood character.

RGZ1

Unlike the other residential zones, neighbourhood character is not an explicit consideration of the RGZ. This is because the zone is intended for areas that are expected to change, and as such, provides opportunity to define design objectives.

The RGZ1 has been applied to support more intensive development around the Sydenham, Sunshine, Keilor Downs, Deer Park and St Albans activity centres. However, design objectives have not been defined, and application requirements require development to respond to 'characteristics identified in the neighbourhood and site description plan' (NSD) and contribute to a 'preferred denser character'. Decision guidelines place emphasis on a transition of built form scale and height to adjoining zones, the extent to which landscaping can soften the appearance of development and transition to adjoining development, the dominance of carparking and access, and the use of building design to protect privacy rather than screens.

The same schedule applies to all RGZ areas, despite variations to their existing contexts and an expectation by Council that the scale of development is graduated with increased distance from activity centres. While this expectation is broadly established in the purpose of the zone (i.e., a 'transition'), specific guidance for how to achieve this transition is not articulated in the zone schedule, other than references in the decision guidelines. Council has had limited success persuading VCAT that a different design response may be required depending on distance from an activity centre. Without clear policy guidance, it is difficult for applicants and decision makers to understand development expectations.

ResCode variations are set out in Appendix 7.9. These variations provide 'mixed messages' regarding support for denser development. Some variations (e.g., increased site coverage standards) allow for denser outcomes while protecting on site amenity (i.e., through enhanced open space requirements for balconies), while others (e.g., front setbacks and reliance on ResCode base standards for walls on boundaries and side/rear setbacks) appear to seek to protect the existing pattern of development by referencing existing development. Council planners have confirmed that in their experience, the front setback requirements are not achieving the desired outcomes and should possibly be reduced.

A review of emerging infill development in sample areas zoned RGZ1 indicate that multi-unit development of 2–3 storeys is occurring. It appears that building heights are likely limited by lot width, and a requirement to meet the objectives and standards of Clause 55.04-1 (Side and rear setbacks) and 55.04-2 (Walls on boundaries). While decision guidelines encourage consolidation of lots to maximise development, this is challenging to achieve.

Additionally, due to the minimum street setback requirement of the RGZ1, developments are generally providing front setbacks of 7m – 9m, to match the existing street setback pattern.

As a result of these policies, developments may make use of cantilevers over driveways to maximise upper floorspace, and front setbacks are often the only meaningful area available space for landscaping or tree planting. This is generally in accordance with B13 (Landscaping) as varied by the schedule to the RGZ, which requires a minimum of one medium sized tree to be planted in the front setback.

Figure 28: Street view (left) and aerial (right) example infill development in the RGZ1 in Power St, St Albans



GRZ1

The GRZ1 applies to neighbourhoods with reasonable access to services, facilities and public transport, including neighbourhoods surrounding the Sydenham, St Albans, Ardeer, Sunshine and Deer Park Activity Centres, and is intended to support incremental change. A single schedule applies to all GRZ neighbourhoods (except the Cairnlea Mixed Use Precinct), despite variations to the existing neighbourhood character of these areas.

No neighbourhood character objectives have been defined, although application requirements require consideration of neighbourhood characteristics and a design response that identifies how the proposed development responds to those characteristics. Decision guidelines place emphasis on a transition of built form scale and height to adjoining zones, retention of existing canopy trees, creation of opportunities for landscaping, the appearance of carparking and access, and retention of prevailing side setbacks.

ResCode variation requirements are set out in Appendix 7.9. Standards A17 and B28 (Private open space) and B13 (Landscaping) are varied by the schedule and seek enhanced landscaping and private open space outcomes.

The GRZ1 is mostly delivering single and double storey multi-unit developments, often with development provided in side by side or tandem arrangements, in accordance with the schedule variations. However, in some instances

VCAT has allowed secluded open space in the front setback⁵⁸ and minor reductions to front setbacks based on the mixed setbacks of the surrounding area⁵⁹.

Generally, tree planting in front setbacks is being achieved; however, planting along driveways is at times limited.

Figure 29: Example development in Albion, where secluded private open space permitted in front setback (far right dwelling)

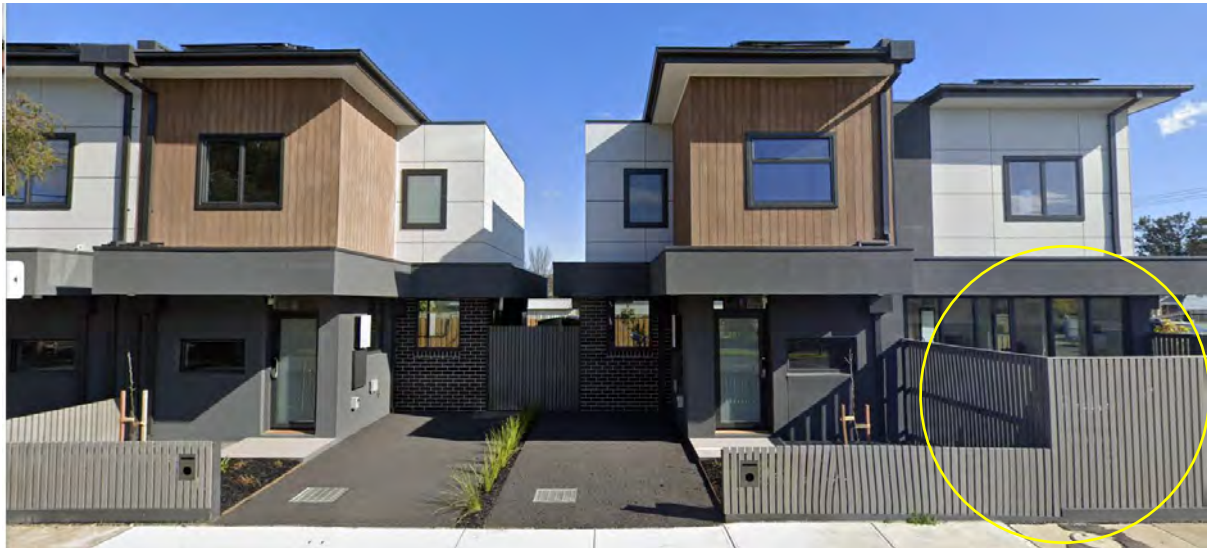


Figure 30: Example developments in GRZ1 in Albion



⁵⁸ Black T Small Footprint Pty Ltd v Brimbank CC [2019] VCAT 1621 (18 October 2019).

⁵⁹ Nguyen v Brimbank CC [2019] VCAT 935 (24 June 2019).

GRZ2

This schedule applies to the Cairnlea Mixed Use Precinct. No neighbourhood character objectives or ResCode variations are used. A 4-storey height limit is specified.

The site is also subject to the DPO4. The site is currently undeveloped.

NRZ1

The NRZ1 is one of two NRZ schedules used in Brimbank. It generally applies to residential areas between activity centres and encourages only limited change. The NRZ1 is applied to a range of different neighbourhoods with varying characteristics.

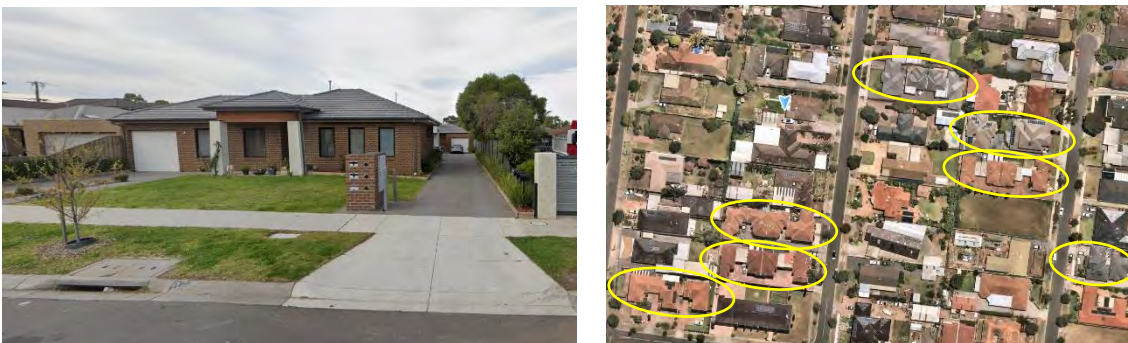
Like the GRZ1, no neighbourhood character objectives have been defined, although application requirements require consideration of neighbourhood characteristics and a design response that identifies how the proposed development responds to those characteristics. Decision guidelines place emphasis on retention of existing canopy trees, creation of opportunities for landscaping, the appearance of carparking and access, and retention of prevailing side setbacks. These are like the GRZ (except for the GRZ's focus on transitions).

Infill development is occurring in the NRZ1, however the lack of specificity regarding how neighbourhood character should be protected or respected in the context of limited change has been the subject of commentary by VCAT⁶⁰, particularly where decisions turn on whether double storey development respects existing neighbourhood character.

ResCode variations are set out in Appendix 7.9. They reduce the site coverage and increase the landscaping and private open space requirements. Combined with the emphasis on side setbacks in the decision guidelines, this schedule seeks a more open and spacious feel.

An analysis of sample infill developments revealed that development outcomes are often similar to the GRZ1. Space is generally being provided for landscaping in front and rear setbacks, although landscaping along driveways is often limited, and canopy trees are not always provided. Developments are predominately arranged in tandem with an accessway running along the side boundary (refer to example of a development in Sydenham in Figure 31, in an area that contains several similar multi-unit tandem developments). While this design response often achieves the site coverage standard, there is reduced opportunity for permeable surfaces and double storey development at the rear can negatively impact neighbourhood character.

Figure 31: Street view (left) and aerial (right) examples of infill development in NRZ1 in Argyll Street, Sydenham



⁶⁰ Riva Ridge Pty Ltd v Brimbank CC [2020] VCAT 1342.

NRZ2

The NRZ2 applies to a small area in Sunshine North. Like the NRZ1, no neighbourhood character objectives are specified, and application requirements require consideration of neighbourhood characteristics and a design response that identifies how the proposed development responds to those characteristics.

The variations to ResCode include a lesser open space requirement than NRZ1. A height limit of 12m applies.

This is a new development area, of predominantly double storey, single dwellings on a lot. Development subject to the Maribyrnong River Valley Design Guidelines that are specific to the development and implemented by the DDO1. There is no 'infill' development as such occurring in the NRZ2.

Figure 32: Street view (left) and aerial (right) example developments in NRZ2 in Sunshine North



Development Plan Overlays

DPOs identify land where a development plan must be prepared to guide future use and development before a permit can be issued. They can be used to provide greater control of design outcomes than zones alone and aim for more cohesive development across specified areas. In Brimbank, DPOs apply to medium to large redevelopment sites and are described in more detail in Appendix 7.7. Each DPO influences neighbourhood character in a unique way, depending on the site, context and development and design objectives of the Development Plan, as show in Figure 33 to Figure 36.

Figure 33: Two examples of development within DPO3 in Sunshine North



Figure 34: Townhouses (left), detached housing (centre) and apartments (right) within Cairnlea Estate



Figure 35: St.A Estate townhouses next to an area under construction (left) and fronting open space and play equipment (right)



Figure 36: Two examples of development within DPO13 in Sunshine West



Design and Development Overlays

DDOs identify areas which are subject to specific design and built form requirements. In Brimbank, DDOs in residential areas relate primarily to:

- > Establishing an appropriate interface with adjoining natural environments and protecting skyline views (such as DDO1 along the Maribyrnong River and DDO5 along Taylors Creek),
- > Ensuring dwellings are built with appropriate noise mitigation (such as DDO4 along the Western Ring Road), and
- > Encouraging high quality design responses in mixed use and redevelopment precinct and around activity centres (such as DDO6 in North Sunshine, DDO7 in Sunshine, DDO9 in St Albans Activity Centre, DDO10 in Keilor Village Activity Centre).

DDOs can give much stronger and more specific design guidance than zones alone. Examples of the outcomes achieved in DDO areas are shown in the Figure 37 and Figure 38.

Figure 37: Detached (left) and apartment (right) dwellings affected by DDO1 in Sunshine North

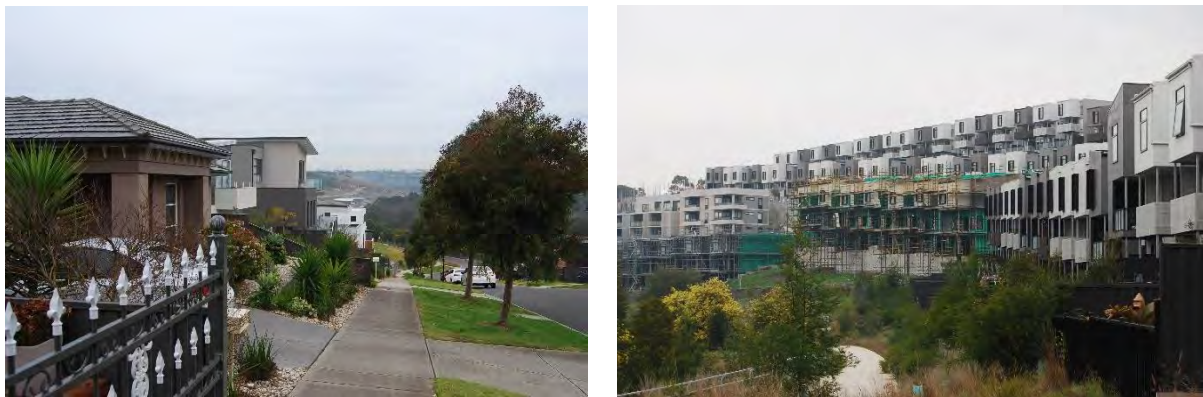
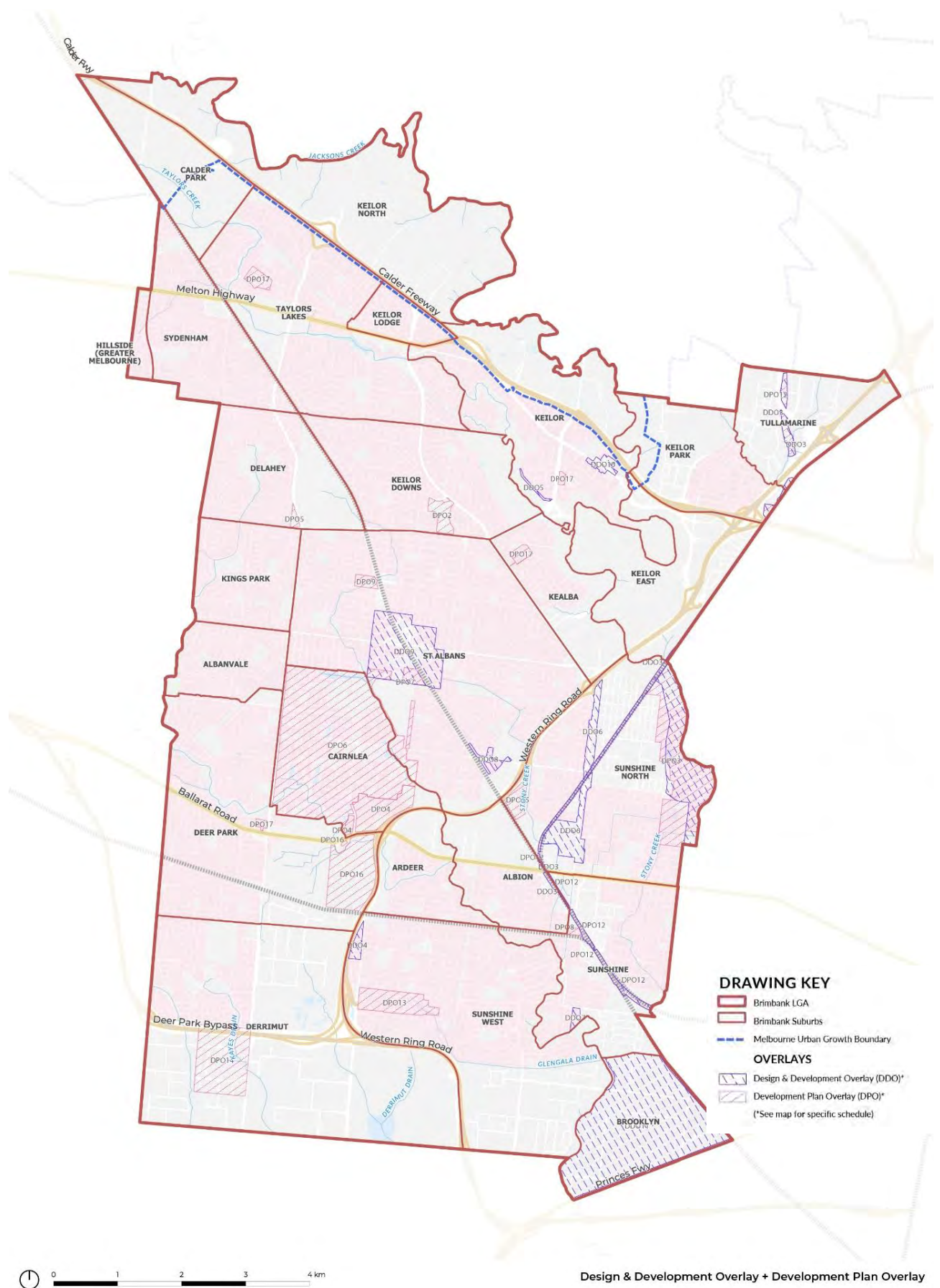


Figure 38: Dwellings affected by DDO7 in Sunshine



Figure 39: DDOs and DPOs



Heritage Overlays

HOs function to conserve and enhance places of natural or cultural significance. These places are identified through heritage studies and other strategic work.

Significant heritage features identified by HOs (shown in Figure 24) are often an important contributor to that neighbourhood's character.

Precinct HOs have a significant influence on neighbourhood character, these include:

- > HO19, affects the Commonwealth Munitions Housing Estate in Sunshine. Dwellings are generally uniform in colour, style and siting, are of low scale and provide moderate front garden landscaping.
- > HO21 affects the ICI Residential Heritage Area in Deer Park. Constructed for industrial workers of the former Nobel factory, these dwellings sit within close proximity to adjoining industrial areas. Dwelling styles reflect a sequence of development in their distinctive styles and forms reflecting Indian bungalow style, cottage style and brick Californian bungalow style. More recent contemporary dwellings are non-contributory to the precinct.
- > HO23 and 24 recognises the McKay Housing Estate along the western boundary of Sunshine and eastern areas of Albion. Heritage dwellings sit amongst more contemporary dwelling styles and infill development.
- > HO25, which affects the Railway Station Estate south of Sunshine Train Station. Dwellings are predominately weatherboard material with Dutch or gable roof styles. New development is limited and largely occurs in Morris Street.
- > HO26 applies to the War Service Homes Heritage Area, north of the McKay Housing Estate in Albion. Dwellings in this area appear to be primarily the original housing stock, with limited infill, contemporary development.
- > HO151 applies to the Grand Junction Estate and Matthews Hill Precinct. Dwellings in this area are predominately traditional housing stock, however contemporary housing forms are present. The overlay also applies controls to the Canary Island Palms that are features in Robinson Street reserves, and the street tree planting at the junction of Hill, Drayton and Matthews Streets.

Figure 40: Two examples of dwellings affected by HO23 in Sunshine



Figure 41: Two examples of dwellings affected by HO26 in Albion



Figure 42: Dwelling affected by HO21 in Deer Park



Albion Neighbourhood Plan (Brimbank City Council, 2013)

The Albion Neighbourhood Plan was prepared in response to community feedback regarding Regional Rail Link works. It sets out a vision for the preferred future for Albion over 20 years, to 2032. This includes actions related to the public realm, connectivity, traffic management, community infrastructure and built form. The plan seeks to strengthen Albion's existing character through protection of heritage and period building elements and to support diverse housing and affordable living.

The plan identified Albion as having a strong sense of identity, with residential areas, local shopping strips and open spaces all contributing to the overall character. It also introduced the possibility of applying an NCO to identify existing and preferred neighbourhood characteristics and to ensure future development would respect neighbourhood character, but the plan alone was not enough to justify an NCO. Strategic work was subsequently undertaken by consultants in preparation for an amendment that would apply this overlay. Ultimately, however, the consultants advised that an NCO would be difficult to justify due to the range of housing present within Albion as well as Albion's similarity to nearby areas.

Previous assessments completed by Hansen, and by Mesh for the 2019 Draft Neighbourhood Character Study, did not identify Albion as a special area. From site inspections undertaken for this Background Report, it has been observed that the character of Albion is somewhat unique and distinct from surrounding areas (refer to Suburb Profile). Some areas are protected by the HO. Outside the HO, many streets comprise the type of low-scale, detached dwellings seen in the HO, particularly in the streets west of Perth Avenue where low scale weatherboard and brick homes are particularly intact. However, between Adelaide and Perth Streets, and Selwyn Street

surrounding Selwyn Park, there are frequent contemporary developments of double storey townhouses and units that disrupt the consistency. This Project will provide strengthened guidance regarding neighbourhood character for Albion; however, whether Albion is sufficiently 'special' to warrant specific controls will be determined as part of the Neighbourhood Character Strategy.

VCAT Neighbourhood Character Planning Decisions

Appendix 7.12 contains a review of several VCAT decisions involving neighbourhood character in recent years (since *Home and Housed* was implemented). This review provides insight into how the current planning framework is being interpreted and common issues that have arisen. Key themes from that analysis, and the relevance to this Project, are summarised below.

Balancing change and character in the RGZ

VCAT opinions varied regarding how much weight a proposed development must give to the existing neighbourhood character context in the RGZ. Conflicts between policy relating to neighbourhood character and the purpose of the RGZ to accommodate substantial change were highlighted, as was the absence of policy direction regarding how character should be considered or balanced against change expectations. This conflict needs to be addressed through this Project, with specific design objectives articulated for RGZ areas.

Key quotes include:

*"It is apparent that the Council's and respondents' concerns with this proposal relate to the scale of change that it will make to the area which is currently dominated by single-storey, detached houses. However, the 'scene has been set' by the zoning of the land as RGZ1, which applies to substantial change areas"*⁶¹

*"In the context of the RGZ1 where substantial change and more intensive development is supported and the purposes of the zone not seeking to protect or respect neighbourhood character, it is to be expected that the form and scale of buildings will be different from the low scale detached housing that currently dominates the character of this area. However, the relevant planning policies do seek a preferred character that consists of 'high quality design that responds to surrounding housing development' and seek 'to promote development that is well designed, innovative and responds to its location and context...These requirements are supported by planning policy in the same way as the encouragement for more intensive housing is supported. Consequently, they carry a similar weight and provide guidance on the future character of the area zoned Residential Growth. In this context, I find that the proposal does not strike an appropriate balance between the objectives for more intensive residential development and the relatively modest landscaping requirements for individual developments"*⁶²

*"...the zoning of the land does not negate the assessment of the development within its context. Contextual understanding of the place in which the site finds itself is important, both from a neighbourhood character and amenity perspective...Within this milieu of lack of incorporated guidelines, discretionary policy directives, and specific zone schedule changes, the importance of a contextual response to the front setback is paramount."*⁶³

Transitioning development intensity in the RGZ

VCAT has set aside Council's position that intensity and scale of development should be graduated in the RGZ with distance from the activity centres. VCAT has noted that there is no policy support for this position, and that transitions referred to in the decision guidelines of the zone schedule relate to interfaces with different zones, not proximity to activity centres or adjoining lots. This finding would suggest that zone schedules will need to be more explicit about how expectations for development transitions are defined (either through multiple schedules or design objectives or decision guidelines).

Key quotes include:

⁶¹ I and F Investments Pty Ltd v Brimbank CC [2021] VCAT 603.

⁶² Canterlever Construction Pty Ltd v Brimbank CC [2021] VCAT 19.

⁶³ CitiWest Constructions Pty Ltd v Brimbank CC [2021] VCAT 363.

“The Council’s expectation of higher levels of change closer to activity centres is not clearly articulated in the planning statements at clauses 21.04 and 21.07...They do not articulate that the intensity of development expected in the RGZ1 is to be graduated relative to proximity to an activity centre.”⁶⁴

“...consideration of issues regarding built form, scale and height transition are focussed on developments that have an interface with land in a different zone, rather than the interfaces between individual lots in RGZ1.”⁶⁵

Absence of neighbourhood character guidance in the GRZ

Cases in GRZ areas that turn on whether the proposal responds to the neighbourhood character have noted the absence of policy guidance and/or the generic nature of policy guiding residential design. Issues relating to siting, setbacks, scale, and design details were determined on a case-by-case basis having regard to the surrounding context. This points to the need for this Project to define spatially specific character expectations for Brimbank’s neighbourhoods.

Key quotes include:

“It was common ground that as there was no specific preferred neighbourhood character statement for this area an assessment of neighbourhood character needs to be based on the existing character of the area, in accordance with Clause 55.02-1 of the scheme.”⁶⁶

“...the siting, massing and appearance of the development should fit comfortably into the prevailing character of the area. There is also clear guidance as to the appearance, materials, front setbacks and location of garages within new developments. Landscaping is clearly encouraged.”⁶⁷

“My reading of the existing generic Clause 21.07-3 Residential Design of the Planning Scheme is that the key elements that contribute to the existing neighbourhood character are building setbacks, colours and finishes, design detail and the landscaped setting. This Clause relates to the entire municipality and is not specific to this local neighbourhood alone.”⁶⁸

⁶⁴ I and F Investments Pty Ltd v Brimbank CC [2021] VCAT 603.

⁶⁵ Ibid.

⁶⁶ Black T/Small Footprint Pty Ltd v Brimbank CC [2020] VCAT 1262.

⁶⁷ Tabone v Brimbank CC [2018] VCAT 100.

⁶⁸ Black T Small Footprint Pty Ltd v Brimbank CC [2019] VCAT 1621.

Adequacy of landscaping

VCAT decisions relating to adequacy of landscaping outcomes in multi-unit development proposals has been mixed. VCAT has supported Council's aspirational policies and ResCode variations that seek better landscaping outcomes than historically achieved in Brimbank. However, VCAT has also pushed back on requests for further landscaping in other instances on the basis of compliance with other open space standards. These mixed interpretations support a strengthened role for policy and design/neighbourhood character objectives relating to landscaping expectations. However, one VCAT member has noted an inherent conflict between increased densities and expectations for greater canopy tree coverage on private land. These findings suggest that policy direction may need to be more targeted to achieve improved landscape and canopy tree coverage in parallel with growth.

Key quotes include:

*"...planning scheme policies, controls and provisions including the varied clause 55 standards and decision guidelines in Schedule 1 to the RGZ...collectively emphasise the importance of high quality urban design and buildings and **better landscaping outcomes** than what has historically occurred in Brimbank."*⁶⁹

*"I think that the compliance of the width of the SPOS areas with the schedule to the zone provides a basis to conclude that these areas can support vegetation that can contribute to landscaping objectives...In my view, (Council) cannot reasonably say that open space areas that comply with the scheme fail to provide an adequate landscaping area."*⁷⁰

*"In regard to a landscaped setting, as I have said already it is very much an aspirational aspect of Council's local planning policies. I think that the way in which the Council has approached this aspiration in this case is (with no offense meant to the Council) a little bit overcooked."*⁷¹

*"I think that an inevitable outcome of encouraging more dwellings within established neighbourhoods is less canopy vegetation within private properties...In areas where further development is encouraged by policy, landscaping has to be largely provided in public area such as streets, parks and shopping centres. It is a reasonable trade-off for the wider benefits of accommodating more people in the established suburbs."*⁷²

Specific housing outcomes, such as reverse living or double storey at the rear

VCAT has noted that reverse living as a design outcome can be problematic in certain locations, particularly where it results in poor internal amenity to avoid overlooking of neighbours.

Regarding two storey development at the rear of the lot, VCAT has noted a lack of policy guidance. In its absence, proposals have been assessed against Clause 55 requirements and the impact of the buildings' mass on neighbours.

These findings suggests that local policy in relation to reverse living formats and double storey at the rear could be strengthened to encourage appropriate siting and design responses.

Key quotes include:

*"reverse living arrangements are most effective when they are designed to take advantage of views."*⁷³

*"There is no specific policy guidance that addresses or discourages such built form (two storey at the rear of lot). Two storey dwellings are contemplated in clause 55.04 through the standards and objectives relating to setbacks to boundaries and walls on boundaries, as well as amenity considerations such as overshadowing secluded private open space and daylight and solar access to habitable rooms."*⁷⁴

⁶⁹ Canterlever Construction Pty Ltd v Brimbank CC [2021] VCAT 19.

⁷⁰ Tabone v Brimbank CC [2018] VCAT 100.

⁷¹ Kropf v Brimbank CC [2020] VCAT 941.

⁷² Tabone v Brimbank CC [2018] VCAT 100

⁷³ Bullion Constructions Pty Ltd v Brimbank CC [2017] VCAT 2097.

⁷⁴ Tabone v Brimbank CC [2018] VCAT 100.

Absence of direction regarding limited change expectations in NRZ

VCAT has highlighted the lack of guidance around expectations for character and change in the NRZ where limited change is specified but with no description of what this means. VCAT has also commented on the perhaps excessive use of the word 'protect' in reference to neighbourhood character, where other State provisions require 'respect'.

The expectations for change in the NRZ have changed as part of the zone reforms, and as such, this Project will need to define clearly what is meant by limited (now referred to as minimal) versus incremental change in the NRZ, and how neighbourhood character can be respected in different settings.

*"In terms of policy, I do note that the local planning policies describe the location of this site and the neighbouring properties as being a limited change area, but there is actually no real description as to what that means. It is used in this planning scheme as a very generic term. It seems to me it is really going to depend on the design that is proposed for a particular site as to whether or not you can be satisfied that it is effectively an acceptably amount of limited change."*⁷⁵

*"'Protection' is quite strong language in a planning scheme. Then the purpose of the zone says that new development should respect the neighbourhood character."*⁷⁶

5.3 General Influences on Character in Brimbank

Lot Size

The size and pattern of residential lots varies across Brimbank. Lot sizes and pattern variation result in differences to dwelling massing, setbacks and landscaping and have a direct influence on neighbourhood character.

Lot size variation also results in housing typology variation. Smaller lots typically indicate townhouse and unit typologies, whereas moderate to large lot sizes typically accommodate detached dwellings. Very large lots may indicate other uses (e.g., schools, childcare etc located in residential zones) or dwelling typologies (e.g., aged care). Table 10 outlines this Project's categorisation of lot sizes and their relevance in terms of planning permit triggers for single dwellings on lots. It is noted that all multi-unit developments require a planning permit.

⁷⁵ Kropf v Brimbank CC [2020] VCAT 941.

⁷⁶ Ibid.

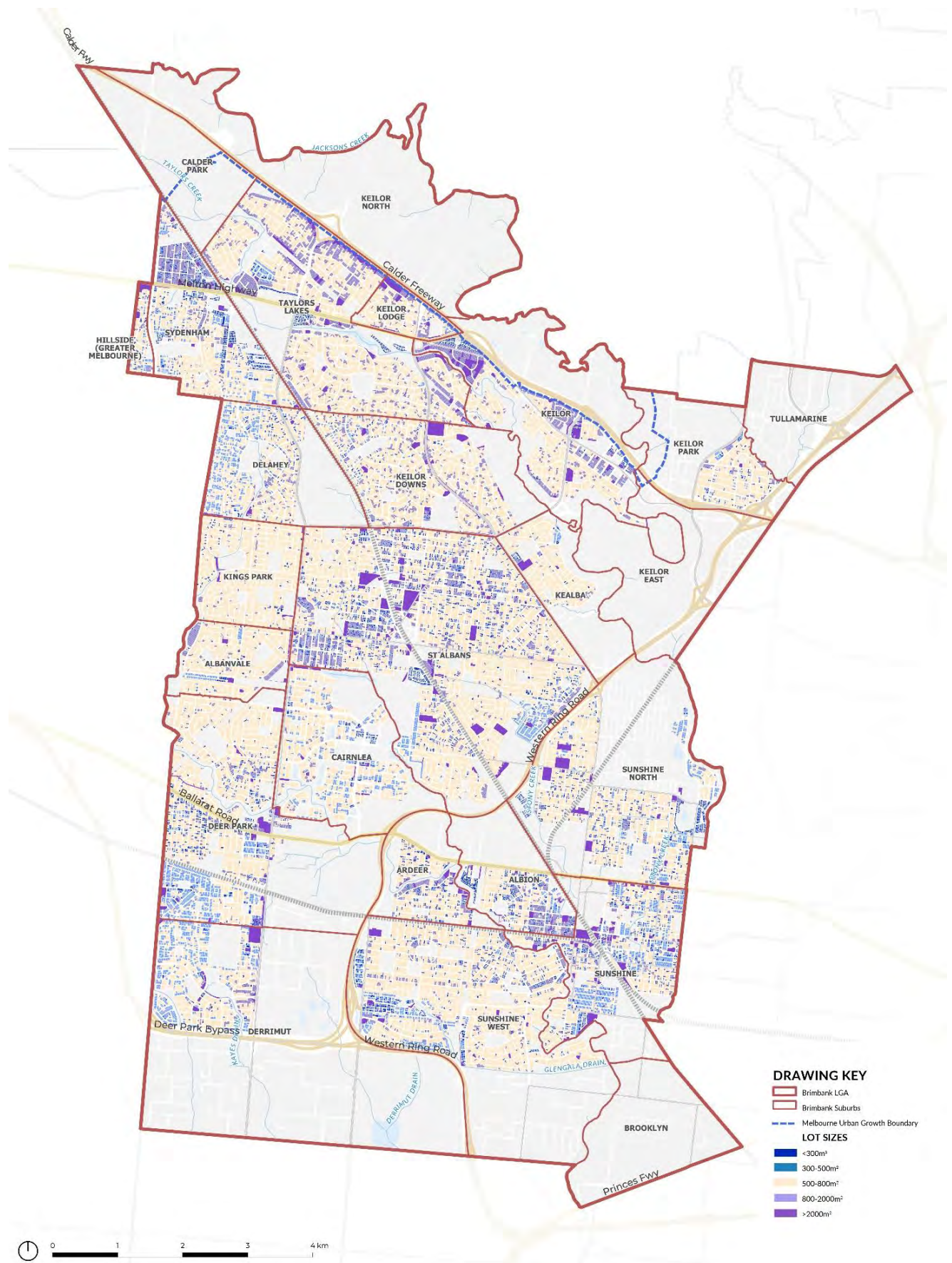
Table 10: Lot size definitions and planning permit relevance

Lot size	Definition	Planning/building approval requirements for single dwellings on lots
Very small	Less than 300m ²	Lot size of less than 300m ² triggers a permit to construct or extend a single dwelling. Proposals are subject to Clause 54 and Clause 55 provisions, and any variations in the schedules to the zones. Building permit must be in accordance with the planning permit.
Small	300–500m ²	Lot size of 300–500m ² can trigger a planning permit to construct or extend a single dwelling in the zone schedule (not currently used in Brimbank). Proposals triggering permits subject to the same provisions as above. If no permit required, a building permit is required to be in accordance with the Building Regulations, and subject to any ResCode variations specified in the residential zones.
Moderate	500–800m ²	A building permit is required to be in accordance with the Building Regulations, and subject to any ResCode variations specified in the residential zones. May attract multi-unit development.
Large	800–2000m ²	A building permit is required to be in accordance with the Building Regulations, and subject to any ResCode variations specified in the residential zones. However, these lots are more likely to be redeveloped for multi-unit developments.
Very large	2000m ² or greater	Very large lots unlikely to be redeveloped for single dwellings.

Small lot sizes generally indicate a moderate level of site coverage with moderate scale private realm landscaping. Clusters of smaller lots within a street or infill development area often comprise greater expanses of impervious surfaces and have reduced landscaping, influencing the landscaping character of an area.

Larger lot sizes can present opportunity for new infill development or present further opportunity for large format residential and aged care outcomes. In areas surrounding university campuses, they also present an opportunity for multi storey student housing. While a positive development outcome from a housing diversity perspective, the potential impact of these uses on neighbourhood character will need to be considered in the context of Housing Strategy objectives to meet diverse housing needs.

Figure 43: Lot sizes



Eras of Development

Residential development in Brimbank spans several eras, from the 1900s to contemporary development and redevelopment. In the 2019 Draft Neighbourhood Character Study, era of development was a key category that defined Character Types.

1900s to 1950s housing

Housing characteristic of the 1900s–1950s is simple in design, reflecting the economic austerity of the time coupled with a desire to modernise.⁷⁷ In Brimbank, residential areas from this time are typically grid-based, with double-fronted detached dwellings of brick and weatherboard on small to moderate sized lots. Dwelling sizes typically allow for front and back yards with plenty of space for lawns and landscaping. Where redevelopment has occurred, it has often been in the form of medium density housing scattered throughout the original housing stock.

Figure 44: Two examples of 1900s to 1950s dwellings in Brimbank



1950s to 1960s (post-war)

Post-war housing was built during a time of prosperity. This is reflected in larger, detached houses designed for families.⁷⁸ As demand for housing was high at this time, dwellings from this period typically feature materials that were accessible and easy to install, such as mass-produced large square windows.⁷⁹ Areas that are characteristic of post-war development have moderate lot sizes and redevelopment has tended to be in the form of multi-unit developments.

⁷⁷ Heritage Council Victoria 2010, *What house is that?* 3rd edition, Heritage Council website, accessed 14 Feb 2023, <https://heritagecouncil.vic.gov.au/your-home/what-house-is-that/>.

⁷⁸ Ibid.

⁷⁹ Clements Clarke Architects 2022, *Design Spotlight: What is Post War Architecture?* Clements Clarke Architects website, accessed 14 February 2023, <https://clementsclarke.com.au/what-is-post-war-architecture/#:~:text=In%20contrast%20to%20Modern%20design%E2%80%99s%20more%20contemporary%20alternatives%2C,windows%20that%20encouraged%20a%20greater%20use%20of%20glass.>

Figure 45: Two examples of 1950s to 1960s post-war dwellings in Brimbank



1970s to 1980s housing

Housing from the 1970s and 1980s reflects an emergence of more modern development styles. Single dwellings tend to be larger than that of previous eras, taking up more space on the lot. This era saw a rise in the popularity of multi-level units and walk-up apartments as a more affordable option.⁸⁰ Visually, houses from the 1970s and 1980s are characterised by their use of red, browns and orange earthy tones, with brick as a common building material.^{81,82} Street layouts from this time tend to exhibit more curves, with cul-de-sacs as a commonly observed element.

Figure 46: Apartment (left) and detached (right) examples of 1970s to 1980s housing in Brimbank



1990s to 2000s housing⁸³

This era of housing reflects the desire of homeowners to express innovation and uniqueness through material selection and the structure.⁸⁴ Dwellings from the 1990s to 2000s typically feature large windows and little decoration of the façade.⁸⁵ In Brimbank, certain areas from this period exhibit variation; others display relative uniformity of design, with large houses on moderate lots. Street networks are curvilinear, with roundabouts and occasional cul-de-sacs. Lack of private open space on individual lots is often compensated for with public open space. Medium

⁸⁰ Pickett C n.d., *The 'six-pack': the past and present of walk-up flats*, accessed 15 February 2023, https://www.aicomos.com/wp-content/uploads/2009_UnlovedModern_Pickett_Charles_SixPack_Paper.pdf.

⁸¹ Ibid.

⁸² Design Build 2018, *The 1970's – A Significant Period for Residential Architecture*, Design Build website, accessed 15 February 2023, <https://designbuildexpo.com.au/design-interiors/1970s-significant-period-residential-architecture/>.

⁸³ Includes up to the present day.

⁸⁴ Domain 2015, 'Project homes and the Individual style of the 90s and 00s', Domain, accessed 14 February 2023, <https://www.domain.com.au/advice/project-homes-and-the-individual-style-of-the-90s-and-00s/>.

⁸⁵ Gross R 2015, *Roots of Style: How Did Your Australian Home Get Its Look*, Houzz website, accessed 15 February 2023, <https://www.houzz.com.au/magazine/roots-of-style-how-did-your-australian-home-get-its-look-stsetivw-vs~26846438>.

density development and infill development, when present, has commonly taken the form of townhouses, duplexes or multi-unit developments.

Figure 47: Examples of 1990s to 2000s housing in Brimbank

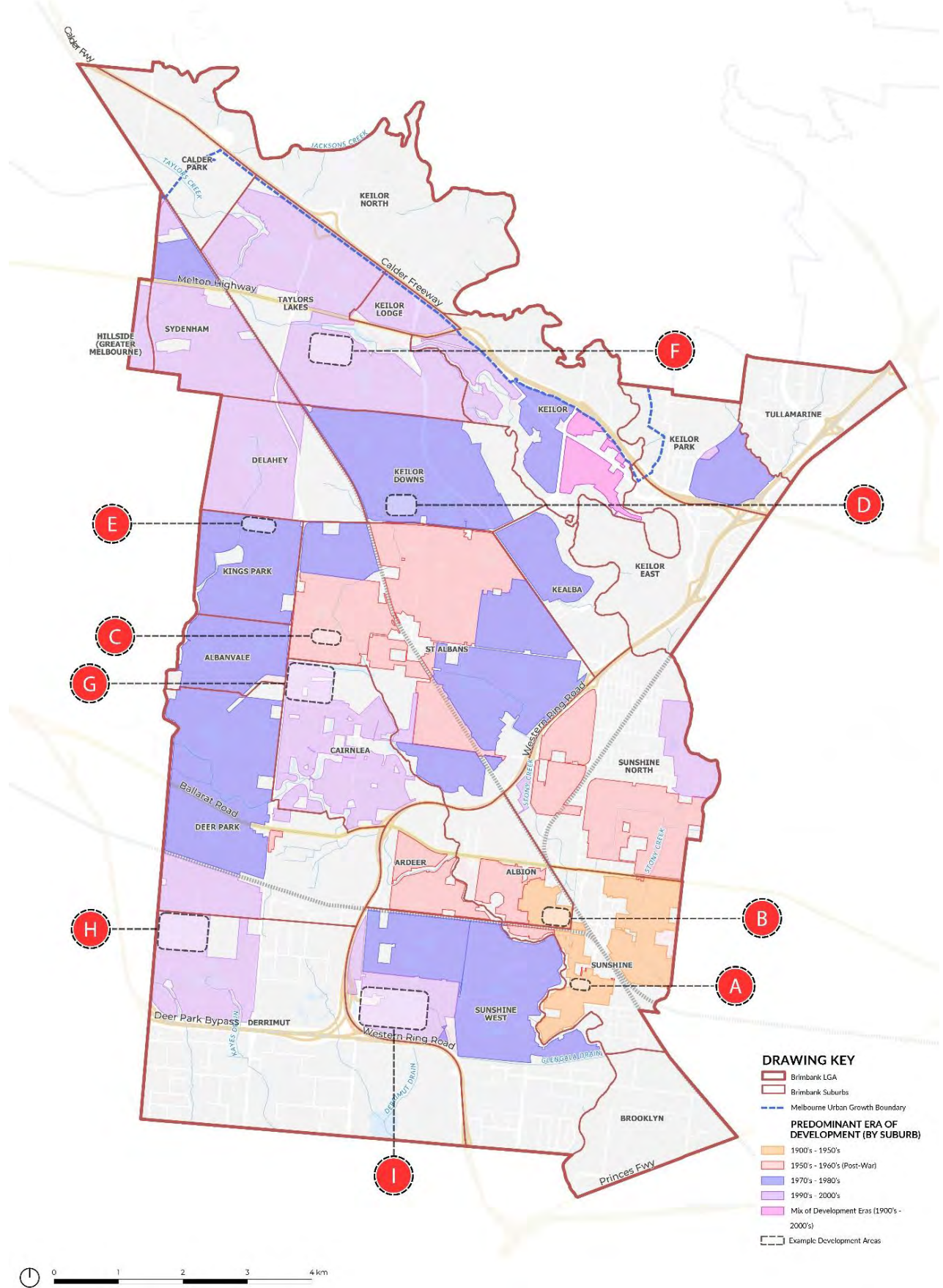


Patterns of redevelopment

In Brimbank, areas originally developed between the 1900s and 1960s have begun to experience redevelopment (i.e., new dwellings that replace older existing dwellings), generally in the form of multi-unit developments or low scale apartments. At the same time, areas of Brimbank more recently developed (1970s–2000s) are experiencing infill development (i.e., new dwellings built on vacant lots within mostly developed areas).

Figure 48 and its associated callouts show examples of patterns of development and redevelopment (where applicable) for each of the eras.

Figure 48: Examples from different eras of development



1900s to 1950s



Sunshine

- Grid street network
- Mostly small sized lots with small houses characteristic of original housing stock
- Moderate to generous setbacks – moderate to generous front and back yards
- Limited contemporary redevelopment



Albion

- Grid street network with wide streets
- Mix of moderate and large original lots with detached housing and small lots with contemporary multi-unit development

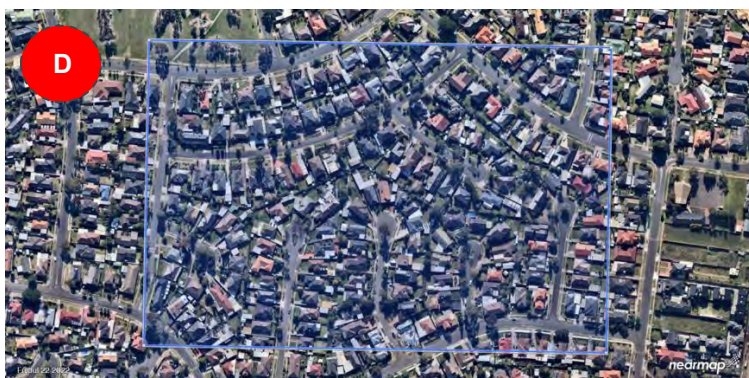
1950s to 1960s (Post-war)



St Albans

- Grid street network with wide streets
- Mix of moderate and large original lots with detached housing and small lots with contemporary multi-unit development

1970s to 1980s



Keilor Downs

- Curved street network with cul-de-sacs
- Moderate front setbacks
- Large houses on mostly moderate sized lots – greater site coverage than previous eras
- Limited medium density development



Kings Park

- Mix of grid and curved street networks with cul-de-sacs
- Large houses on mostly moderate sized lots – medium to high level of site coverage
- Limited medium density development

1990s to 2000s



Taylors Lakes

- Curvilinear street network
- Large houses on mostly moderate sized lots – high level of site coverage
- Backyard swimming pools are common
- Integrated network of public open space



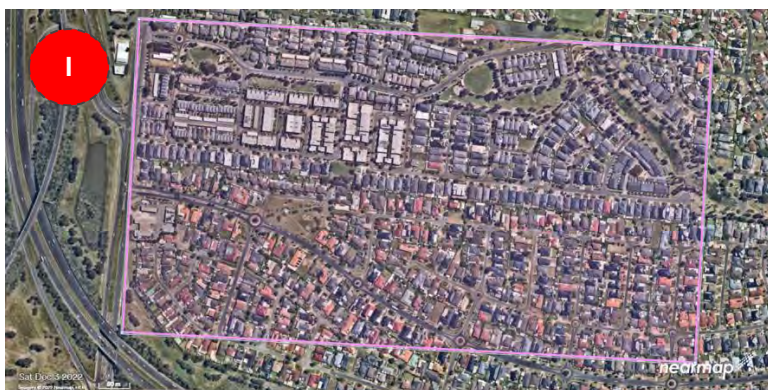
Cairnlea

- Curvilinear street network
- Large houses on small to moderate lots – medium to high level of site coverage
- Scattered duplexes and multi-unit developments
- Integrated network of public open space
- Limited medium density infill development (some townhouses in the bottom lefthand corner)



Derrimut

- Curvilinear street network
- Large houses on small to moderate sized lots – high level of site coverage
- Integrated network of public open space



Sunshine West

- Curvilinear street network
- Minimal to moderate setbacks – high level of site coverage
- Sizeable areas of infill medium density development in the form of townhouses and low scale apartments
- Integrated network of public open space

Landscape Interfaces

Some of Brimbank's residential areas interface with creek lines, undulating topography and significant grasslands (which are often affected by ESOs or SLOs). In other areas, utility corridors such as powerline easements and drainage corridors interface with residential areas. These features shape residential subdivision patterns, connectivity to adjoining areas and have a broader influence on the character of an area.

Building forms and siting in the north and north-east within Keilor, and more recently Sunshine North, are influenced by undulating topography and adjoining creek lines. Clause 12.03-1L⁸⁶ (in the PPF) directs development in these areas to be set back along escarpments and ridgelines to accommodate landscaping that minimises the visual impact of development. Clause 12.03-1L also requires development design to respond to the natural topography of the land, minimising cut and fill and discouraging the construction of large extents of impervious areas.

Despite this, some developments in Keilor and Sunshine North utilise cut and fill, and design responses often appear to take advantage of view lines rather than being 'tucked' into the topography.

Some ESOs and SLOs along river and creek corridors incorporate built form objectives and guidelines seeking to protect views, avoid visually intrusive buildings and works and to achieve particular landscape outcome. However, these overlays have limited scope to directly influence the development on adjoining residential areas as they apply only to the public land, not the residential land.

DDOs are the primary tool for guiding the built form, along these interfaces, however, the current DDOs comprise less detail and direction than the ESO/SLO.

This Project will need to consider whether there is a need for strengthened built form or landscape controls at the interfaces to these sensitive and significant corridors, and in particular, whether there is a need to review the DDOs.

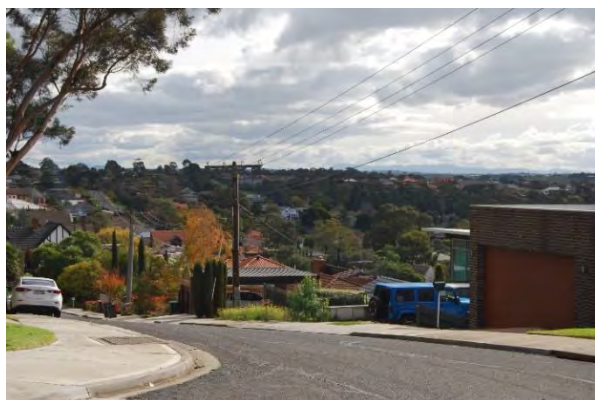
Fifteen percent of Brimbank comprises local parks and reserves which provide greening amenity, access to open space for residents and influence neighbourhood character. In areas adjoining large open space and natural settings such as Keilor and Taylors Lakes, landscaping often connects across the private and public realm including onto the nature strip and contributes to the landscape setting.

Other residential areas which abut small scale open spaces and creek lines often use rear fences to separate residential areas from adjoining open space. Examples of this occur in Albanvale, Delahey, Kings Park and Deer Park.

Residential interfaces to utility corridors vary. In Hillside, drainage corridors provide opportunities for additional canopy coverage and informal pedestrian connections. In Taylors Lakes and Sunshine West, residential development often provides rear fence interfaces with powerline easements which limits connectivity.

⁸⁶ Clause 21.05 in the current old format LPPF.

Figure 49: Landscape setting in Keilor (left) and a rear fence interface to a park in Albanvale (right)



5.4 Contributors and Threats to Neighbourhood Character

A summary of site inspection observations is included in the Neighbourhood Character Suburb Profiles (the Suburb Profiles) in Appendix 7.13.

The following features have emerged as the dominant contributors or threats to neighbourhood character in Brimbank. Contributors and threats are used, along with the Suburb Profiles, to inform the emerging neighbourhood character precincts outlined in this Background Report and will be used to inform preferred character statements in draft Neighbourhood Character Strategy.

DEFINITIONS

Contributors: Features that comprise or add to neighbourhood character.

Threats: Features that have the potential to impact on or erode neighbourhood character.

Contributors

Vegetation and Landscaping

The cumulative effect of vegetation and landscaping contribute to neighbourhood character in Brimbank, specifically:

- > Landscaping of the public realm including open space, pocket parks and linear reserves.
- > Retention of remnant native vegetation in open grasslands and bush land reserves.
- > Landscaping of individual private gardens.
- > Establishment of street trees and canopy trees in both the public and private realm.

Public realm landscaping is a mixture of informally and formally planted native and non-native vegetation in open space reserves, nature strips, central medians and as part of streetscape improvement works. Where private realm landscaping contributes to character, it is predominately in the form of moderate scale, formal gardens. Species selection is varied, and often reflects the era of development or the preferences of individual landowners. Exotic Palms and Cyprus trees are a regular feature in private gardens. These are particularly evident in Keilor Downs, Hillside and Sydenham. In other areas a mixture of native species, fruit trees and olive trees line streets and contribute to overall canopy coverage and local character. Olive and fruit street trees are typical in Keilor Park and St Albans.

There is not one dominant landscape style across the municipality. Areas in the north, such as Keilor and Keilor Lodge, typically exhibit greater scale, volume and variation in species planting. Areas in the west, such as Delahey and Kings Park frequently exhibit lower-scale planting and greater expanses of lawn.

As noted in the Residential Zones assessment above, enhancement of landscaping on private lots, and particularly in the front setback, has been a key focus of the zones to date.

Suburbs where landscaping and vegetation typically contributes to neighbourhood character include Keilor, Keilor Lodge, Keilor Downs Taylors Lakes, Hillside and St Albans.

Figure 50: Landscape setting in Keilor Lodge (left) and exotic and Cyprus trees in Keilor Downs (right)



Consistency of Siting, Setbacks and Site Coverage

The scale and siting of dwellings influences the character of a streetscape. Consistency and uniformity are created by dwellings which conform to similar building envelopes and address to the street. New developments which respect the existing siting and setbacks of the street continue to contribute to the streetscape even when material selection or form differ.

The siting and setbacks of dwellings varies significantly throughout Brimbank.

Uniform siting and setbacks are a particular feature of 1970–1980's style development in Sunshine West, Keilor Downs, Keilor Park, Kealba, Kings Park, Albanvale and parts of Deer Park, St Albans and Keilor. These areas generally exhibit moderate front setbacks and vehicle parking within a side setback. The alternate side setback (on the other side of the house) in this instance is typically smaller, but still retains separation to the adjoining dwelling.

An increase in site coverage is typical of contemporary development in Keilor Lodge, Kealba, Keilor and Derrimut. Dwellings in the north typically have uniform, moderate front setbacks which provide opportunity for landscaping. Minimal to moderate front setbacks are more typical in the south where an increase in site coverage results in large areas of impermeable surfaces and reduces canopy coverage.

Figure 51: Moderate uniform front setbacks in Kings Park (left) and reduced front setbacks in Derrimut (right)



Consistency of Building Heights

Brimbank's traditional housing stock is predominantly single and double storey. The consistency of these heights can contribute to the character of an area. This is particularly evident in Ardeer, Albanvale, Kings Park, Deer Park and Delahey where consistent single storey building heights contribute to a low scale setting and creates sightlines to canopy trees.

In other areas infill development typically constitutes 2-3 storey building heights. The consistency of double or greater building heights in these locations contributes to the evolving character of an area. This is evident in St Albans, Sunshine and Sunshine North. This is also particularly evident in areas abutting activity centres in Cairnlea, St Albans and Sunshine where new development often achieves three storey or greater building heights.

Figure 52 Taller building heights in St Albans (left) and consistent single storey building heights in Delahey (right)



Consistent, Complementary Colours and Materials

Consistent colours and materials can contribute to the cohesiveness of an area.

Brick is a common material used throughout Brimbank. Colours are typically brown and/or orange tones. Brick materials typically require less upkeep than timber materials and contribute to the sense of a well-maintained streetscape or area. Dwellings adjoining waterways and ridgelines which feature muted tones and natural details visually integrate dwellings into the broader natural environment. This is evident in Keilor along Riverside Avenue as an example.

In other areas, contemporary development varies colour and material palettes from existing development, but respects other character features, and as a result, complements rather than conflicts with the streetscape. This is particularly evident in Cairnlea and Derrimut where colours and material diversity create visual interest and streetscape variation.

Suburbs where colours and materials contribute to character include Keilor, Hillside, Derrimut, Cairnlea, Albion, Ardeer, Sunshine and Sunshine West.

Figure 53: Consistency of brick colours in Ardeer (left) and diversity of colours and materials in Cairnlea (right)



Low to Moderate Height Front Fencing

Consistent low to moderate height front fencing contribute to the character and spaciousness of some streetscapes. Many residential areas within Brimbank have no front fences or low scale fences which allow views to and from the streetscape. These fencing styles create a sense of openness in the streetscape. In areas with no front fencing, vegetation is often used to delineate between the public and private realms. This is commonly seen in the northern suburbs.

Low front fences or planted vegetation border treatments contribute to an open frontage whilst maintaining a level of separation and definition between the public and private realm. Planted vegetation border treatments are typically observed in the north. Picket and pool style fencing treatments are more dominant in the south.

Low to moderate height permeable 'picket' fencing styles often features as part of heritage dwellings in Sunshine and Albion and contribute to the heritage character. 1970's–1980's development often incorporates low permeable brick fencing which matches the dwelling style.

Suburbs where low to moderate scale fencing and hedging contributes to character include Hillside, Keilor Lodge, Taylors Lakes, Sunshine, Cairnlea and Albion.

Figure 54: Low scale picket fencing in Sunshine (left) and hedging fencing treatment in Taylors Lakes (right)



Integrated Infill Development

Infill development and renewal of traditional housing stock plays a major part in the level of change occurring across Brimbank. Infill development typically occurs on vacant or underutilised sites. In Brimbank infill development is increasingly occurring to the rear of traditional housing stock, as part of dual occupancy development.

In some areas, infill development has had regard to or is integrated with the existing character features of a street or area. There are some infill developments that have sympathetic visual bulk, maintain the pattern of existing setbacks, and retain similar building styles, roof styles and material palettes to adjoining traditional housing character.

Examples of integrated infill development are located in Ardeer, Sunshine West, Keilor Park and Taylors Lakes.

Figure 55: Infill development that respects existing front setbacks in Ardeer (left) and Keilor Park (right)



Connections to Open Space

Ridgelines, creek lines, open space and areas of landscape value have a significant relationship with residential areas across Brimbank. These areas contribute to the overall look and feel of a neighbourhood, whilst also contributing to a unique sense of place.

Residential connections to adjacent open space and undulating topography allow for view lines and connections to native vegetation and landscape values. This often contributes to a sense of spaciousness and/or connection to the broader natural environment.

Examples of areas connected to open space and landscape values include Keilor, Kealba, Sunshine North, Cairnlea, Derrimut and Albion.

Figure 56: City views from Kealba (left) and residential frontage to open space in Cairnlea (right)



Street layout

Brimbank is characterised by a mixture of grid base and curvilinear street networks which vary from suburb to suburb. Street networks contribute to neighbourhoods in terms of legibility, connectivity and walkability.

Wide streets which are paired with moderate dwelling front setbacks and moderate scale landscaping contribute to a spacious street setting feel. In other cases, narrow streets which are paired with moderate front setbacks and off-street car parking contribute to a sense of enclosure. Cycle and pedestrian connections increase connectivity to key neighbourhood assets. Road paving such as red brick entry treatments contribute to identity and legibility.

Suburbs where street layout contributes to neighbourhood character include Hillside, Keilor, Keilor Lodge and Albion.

Figure 57: Red brick entry treatment in Keilor Lodge (left) and narrow roads with off-street car parking in Hillside (right)



Threats

Excessive bulk or height

The height and bulk of new development varies between and within neighbourhoods. At times, this height and bulk can conflict with existing character. Policy supporting housing growth in locations adjoining activity centres and public transport hubs has at times resulted in built form bulk or height that is substantially greater than the existing housing stock. This is evident in St Albans and Sunshine, where change is expected, and as such the character of the area is expected to change over time.

In other locations where less substantial change is expected, infill and major development can be a threat to character. There are several infill developments that are visually bulky and incorporate reduced setbacks and greater site coverage than the buildings surrounding them. Examples include Talmage Street Albion, McCann Drive Albanvale and Old Calder Highway Keilor. These developments often do not provide canopy trees and limit the space for private gardens and deep soil planting.

Figure 58: Infill development in Sunshine West (left) and infill development in Keilor Park (right)



Inadequate landscaping

Inadequate landscaping of new development, or loss of existing vegetation in both private gardens and the public realm, is a threat to the established landscape character of many areas. Landscape character within Brimbank is created by a combination of street tree provision, established canopy coverage within lots and open space, and moderate private realm landscaping. New development can impact landscape character by providing inadequate space for landscaping and canopy trees. Increased site coverage reduces the opportunities for deep soil planting.

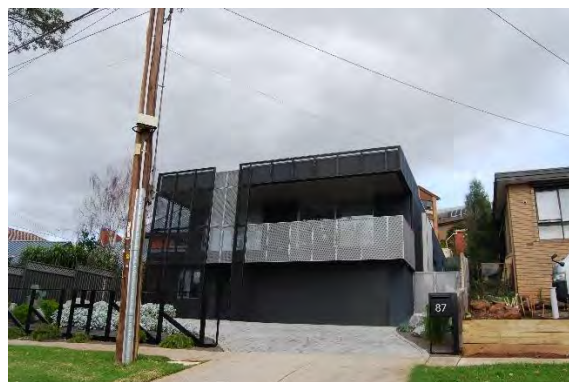
A loss of established vegetation and landscaping can also threaten the natural character and spacious green setting of a neighbourhood.⁸⁷ Removal of vegetation and landscaping in Keilor, Keilor Lodge and Taylors Lakes would threaten the natural landscape character of these areas. The development of contemporary townhouses and infill development in these areas often provides smaller garden areas and lower scale landscaping than what is typically achieved as part of nearby or adjoining traditional housing stock.

In some areas such as St Albans and Keilor Downs, fruit and olive trees are often used in front gardens and as street trees, which establishes a specific landscape character. The existing landscape character could be threatened by new development if the existing theme of planting is not considered or if street trees are removed for additional crossovers.

In other areas, new development often does not achieve the provision of a canopy tree even when space is provided (and often despite permit conditions requiring a tree). In these instances, lawn, gravel, artificial turf, or mulching is often provided in lieu of a canopy tree. This may be due to conflicts with underground services, or for a range of other reasons. Without the provision of a canopy tree as part of new development, the existing landscape character of the suburb could be further threatened.

Localities where vegetation removal or inadequate private realm landscaping could impact character include Keilor, Hillside, Keilor Lodge, Deer Park, Sunshine North, and St Albans.

Figure 59: New development in St Albans (left) and Keilor (right) with a reduced amount of landscaping compared to the landscape or garden setting of the suburb



Poorly Integrated Retirement Villages, Aged Care Facilities or Mixed Use Development

There is increasing pressure within and adjoining residential areas for mixed use development. The pressure is greatest in the northern suburbs and where vacant sites surround existing mixed use precincts. This type of mixed use development typically includes retirement villages, aged care facilities and child care centres. It also includes expanded shopping centres or employment land uses in key locations.

An increase in mixed use development within and adjoining residential areas can be a positive for the neighbourhood, but if poorly designed or integrated, may threaten the cohesiveness of existing neighbourhood character.

In some areas, mixed use development and larger scale infill development is already disrupting the existing streetscape and character of the area. In some areas mixed use and infill development introduces fencing and material variation to a streetscape. In other areas it removes existing vegetation and creates large expanses of car parking. Increases to the scale of building heights and massing adjoining employment and health land uses also impacts view lines, results in visual bulk or extends expanses of blank walls.

⁸⁷ While this often implies (and does encompass) trees, it is also noted that grassland is the natural state of the land in many areas of Brimbank.

Residential aged care facilities are common in the northern parts of Brimbank. They are typically gated and have higher, less permeable fencing than surrounding buildings. This also limits address to and passive surveillance of the street. If maximum allowable building heights under Clause 53.17 are reached the existing character of an area may then be impacted by aged care facilities that seek heights greater than those that exist or are permissible under the existing residential zone. Aged care facilities may further impact the rhythm of the street, view lines and the landscape quality of an area, threatening the existing character.

Localities where pressure for further mixed use development, retirement or aged care facilities are anticipated to impact character include Sunshine, Sunshine North, Albion, Taylors Lakes, Deer Park, Keilor Downs and St Albans.

Figure 60: Gated retirement village interface with the residential area in Ardeer



High Fencing

Typically, residential areas are characterised by no or low front fencing or the use of hedging as a boundary treatment. The introduction of more dominant fencing styles that disrupt views to front gardens and the street is a threat to existing character.

High front fences with reduced permeability are prevalent along major roads or high traffic areas or adjoining mixed use precincts. High fences appear to be employed as a method of noise reduction and/or privacy. These outcomes are often appropriate along key roads such as Old Calder Highway but threaten existing character when provided on more local road networks, including long runs of side fencing along local streets. These outcomes enclose the street and impact the relationship between the private and public realm.

High Colourbond fencing is frequently observed in replacement of low, more permeable fencing in St Albans. This threatens the predominate low to moderate scale permeable fencing character of the area and reduces sight lines to and from the public realm.

In many suburbs, such as Ardeer, Albion and Keilor Downs low to moderate fencing is a character feature. These fences are typically permeable, and the low scale allows for continued views to gardens and a connection between private and public realm. The introduction of high front fences would disrupt the rhythm of the street and dilute the existing fencing character of the area.

Suburbs where an increase in high scale fencing could impact character include Keilor Downs, Keilor, St Albans, Ardeer, Albion and Derrimut where low fencing predominates.

Figure 61: Dominant fencing in Taylors Lakes (left) and Keilor Park (right)



Dominant Vehicle Access and Parking

The siting and design of vehicle access and parking varies across Brimbank and impacts streetscape character and landscaping. The use of front setbacks and nature strips for additional vehicle parking is common. Gravel or other hard surfaces are used in addition to driveways, which results in a loss of landscaping.

Residential dwellings typically feature a carport and/or garage structure. Carports are typically located in line with the dwelling façade or located within the side setback. Carports tend to occupy the full width extent of the side setback. Garages are typically integrated as part of the dwelling or dwelling façade, are built to the boundary and often occupy a large portion of the dwelling frontage. Dominant double garages erode the streetscape character as they reduce opportunities for passive surveillance and increase expanses of blank single colours/materials.

These are typical in contemporary development within Cairnlea and Derrimut. In other locations such as Keilor Lodge, Taylors Lakes and Kealba, larger lot widths allow for double garages to be screened by landscaping or setback from the dwelling frontage. This reduces their dominant presence to the street and is lesser threat to character.

Suburbs where dominant vehicle access and parking influence character include St Albans, Albanvale, Albion, Ardeer, Sunshine, Sunshine West, Sunshine North, Keilor, Keilor Lodge, Taylors Lakes.

Figure 62: Dominant vehicle parking in Kings Park (left) and dominant double garages in Sunshine West (right)



Change in Materiality or Style

The consistency and uniformity of colours and materials influence neighbourhood character. Most of the older dwellings across Brimbank are constructed using brick materials in brown, orange and cream tones and weatherboard material in soft muted tones.

Contemporary development introduces new materials and colour palettes, some of which stand out from their surrounds. This includes the introduction of render, concrete, metal and other modern materials in white and grey tones. An example of this is contemporary development in Albanvale which introduces rendered concrete and metal materials. Contemporary development can also feature dominate colour schemes, contrasting with traditional housing stock and exaggerating its presence within the streetscape.

Dwellings in proximity to natural environments often feature muted tones with natural materials. This integrates the dwelling with the surrounding environment and contributes to a landscape setting. Contemporary development which introduces more dominant colours or reflective materials threaten the landscaping character of these areas.

Suburbs where changes in materiality or colours could impact character include Albion, Ardeer, St Albans, Sunshine North, Albanvale, Kings Park, Delahey.

There is a level of consistency in the provision of eaves as part of the building form across Brimbank. In most suburbs development typically consists of pitched roofs with eaves or other design details which protects the dwelling from sun and moisture and articulates the façade. While many contemporary architectural styles (such as flat roof designs) do not include eaves as part of their vernacular (Figure 63, left image), other styles incorporate minimal eaves (Figure 63, right image) that are of limited practical value (i.e., for shading) and clash with existing traditional architectural styles.

Suburbs where the reduction in eaves as part of the building design could impact character include Cairnlea, St Albans, Deer Park, Sunshine, Sunshine North and Sydenham.

Figure 63: Introduction of new materials and colours in Albion (left) and new contemporary development in St Albans with minimal eaves (right)



Limited Connectivity or Accessibility

In some areas of Brimbank there is limited pedestrian or vehicle connectivity or accessibility or visual connectivity between suburbs or key nodes because of high fences or noise barriers. Limited connectivity or accessibility is a notable feature of some suburbs which erodes the overall look and feel of a neighbourhood.

Rail noise barriers in Sunshine West, Ardeer and Albion are a dominant feature of the street. In some instances, rail barriers visually separate residential areas which have similar character features.

In other areas dead-end streets or busy roads limit access and connection through the suburb and to adjoining areas. Dead-end streets in Kings Park and Keilor Downs separates residential development from adjoining areas with similar character features. The Western Ring Road separate areas with similar character features in St Albans and Sunshine West.

Figure 64: Residential areas in Sunshine West with an interface to the rail noise barrier



5.5 Emerging Character Types and Precincts

Neighbourhood character precincts are areas of a similar character type—meaning, they have similar contributory features. Their role is to clearly identify what makes one area distinct from another. Identifying the comparative **differences** between areas determines the precinct boundaries. Once neighbourhood character precincts have been defined, they can be used to craft neighbourhood character statements in the Neighbourhood Character Strategy (see call out box).

Character precincts are used as the basis for drafting neighbourhood character policy and should align with areas identified for minimal, incremental or substantial housing change (to be defined by the Housing Strategy, with input from the Neighbourhood Character Strategy).

While most neighbourhoods exhibit diversity from street to street, and at times, house to house, broad character types can be defined. The methodology of the 2019 Draft Neighbourhood Character Study adopted an alternative approach to defining precincts than used in this Project (based smaller, discrete neighbourhood areas within the same zone). The peer review of the Draft Neighbourhood Character Study 2019 noted several of the 39 precincts defined at that time comprised similar attributes, presenting opportunities for consolidation of precincts and character types. As such, this Project took a different approach, using suburbs as the unit of analysis (which vary in scale and can comprise numerous neighbourhoods and multiple zone types), and then identified character types based on this analysis. This different methodology (which was supported by peer review), has resulted in slightly different findings between the 2019 and current analysis.

Other recently prepared Neighbourhood Character Strategies⁸⁸ tend to define six or seven different character types, with defining characteristics relating to landscape setting, housing forms, subdivision patterns and era of development.

To define character types in Brimbank, this Project has considered the findings in the Suburb Profiles to identify similarities, and importantly, comparative differences between areas. In many cases, era of development has been the most important factor – differences in era of development exerts a strong influence on the pattern of subdivision, the form of housing and how it is sited on the lot, and the landscaping context of the street and private areas.

DEFINITIONS

Neighbourhood character statements identify features that establish the existing character of an area and articulate preferred future character. They can be informed by several factors, including identified character features, special characteristics of an area and the views of the local community. Character statements can seek to shift areas toward a preferred character or design or protect areas where the preferred character already exists.

In describing the existing character, they strive to capture what most strongly contributes to an area's sense of place and differentiates it from other areas. In doing so, they enable comparisons to be made with immediate surroundings, other parts of the municipality and the wider region, as needed. In articulating preferred future character, they outline the vision for incremental or substantial change.

⁸⁸ Hobsons Bay Neighbourhood Character Study, 2019, Nillumbik Draft Neighbourhood Character Strategy, 2022, Glen Eira Neighbourhood Character Assessment and Future Character Framework, 2021

This Background Report has defined six broad emerging character types that will be used as draft inputs into the Neighbourhood Character Strategy. These character types do not seek to define change or development expectations yet (that will be undertaken as part of preparation of the RDF), but rather, reflect observations and analysis undertaken as part of this Project.

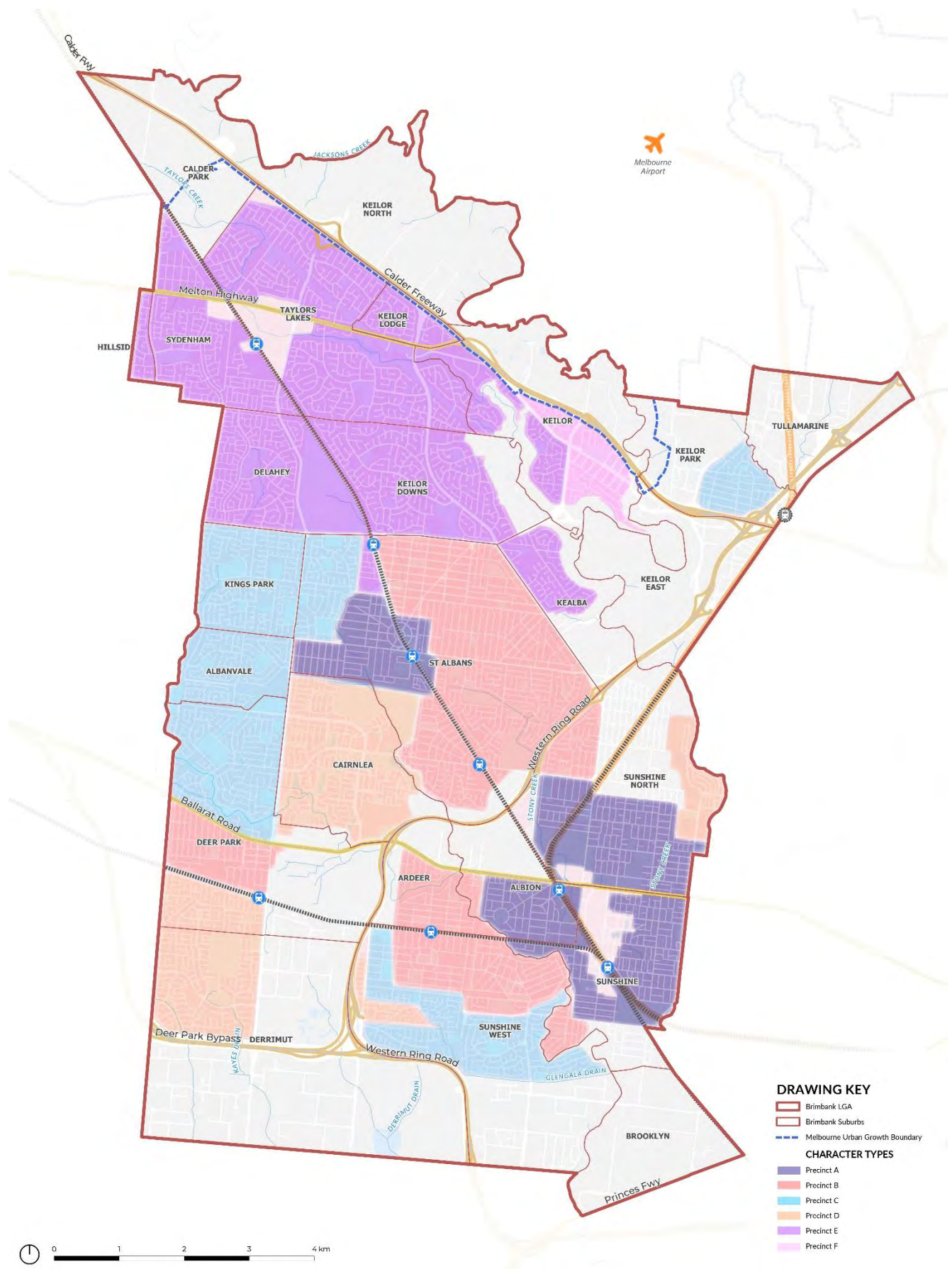
Applying the Character Types spatially to Brimbank's neighbourhoods has required judgments to be made about the comparative differences of certain areas. While suburbs were used as the initial 'unit' for assessment of character, they were not the primary factor used to define Character Precincts. For example, Precinct F includes entire, generally contiguous suburbs grouped together in a Character Precinct as these areas were relatively similar in their contributory features. Precinct A, by contrast, comprises only parts of suburbs (Sunshine and St Albans). While spatially unconnected, these areas, located around the train stations, exhibit a distinct subdivision pattern and housing style that is comparatively different from the surrounding areas, despite being within the same suburb.

It is expected that the emerging character types and precinct boundaries will evolve during preparation of the Neighbourhood Character Strategy and the RDF.

Table 11: Emerging Brimbank neighbourhood character types

Character Type	Suburbs	Contributory Features
Precinct A	Sunshine (part) Sunshine North (part) Albion St Albans (Surrounding town centre)	Characterised by varied traditional low-scale housing typologies in mixed brick and weatherboard materials that date back to the original industrial worker estates. Contemporary infill development generally double storey with some 2-3 storey developments emerging. Generally consistent moderate front setbacks provide space for moderate front garden landscaping and canopy trees within the private realm. Fencing is typically low to medium in height, permeable and in brick or timber material. The street network is wide, some tree lined, and in a non-conventional grid style. Heritage dwellings are common and infill development is occurring.
Precinct B	St Albans (east of train line) Deer Park(north of train line/south of Ballarat road) Ardeer Sunshine West (south of rail line) Sunshine North (north of Furlong Road)	Characterised by diverse building styles which are reflective of renovation or redevelopment of traditional housing stock. There is a mix of single and double storey building heights which are typically on moderate lots sizes. Moderate front setbacks provide space for moderate landscaping. Varied consistency in streetscape planting and landscaping, often comprising deciduous trees and olive trees. Fencing is typically low, in brick material. The street network is wide and grid-based providing pedestrian paths on both sides.
Precinct C	Keilor Park Kings Park Albanvale Deer Park (north of Ballarat road) St Albans (north of Main Road W and west of Jamieson Street) Sunshine West (west and southern areas)	Characterised by single storey, detached dwellings in brown, orange and cream brick. Front setbacks are moderate and contain moderate landscaping typically behind medium height permeable front fences. The street network is narrow and curvilinear with footpaths on both sides of the street, with varied streetscape planting - some well planted with established street trees, others with sparse planting, particularly where streetscapes fragmented by driveways. There are limited instances of infill development on local streets.
Precinct D	Sunshine West (western area) Derrimut Deer Park (south of train line) Cairnlea Sunshine North (River Valley Estate)	The contemporary master planned nature of development results in generous public realm landscaping and positive residential interfaces to open space. There is limited to no front fences and minimal front garden landscaping. Featuring detached dwellings with frequent pockets of townhouse and unit development. Building styles, colours and materials are varied and often include integrated garages and dominant driveways.
Precinct E	Taylors Lakes Sydenham Keilor Lodge Keilor Downs Kealba Hillside Delahey St Albans (north of Margrave street) Keilor (west of Green Gully Road)	Featuring brick dwellings in varied colours, with articulated front facades and large windows. Front landscaping is moderate-generous in scale and often contains mixed species planting and canopy trees. Front fencing is limited. There is a mix of single and double storey building heights. The street network is wide and curvilinear with dead-end streets, and established canopy tree planting of varied species in many streets. Contemporary townhouse development of 2-3 storey is emerging closer to activity centres.
Precinct F	Keilor (adjoining Old Calder Highway)	Defined by its green and spacious landscape setting. Dwellings are situated on larger lots with generous landscaping including expanses of lawn, mixed species selection and large canopy trees. Dwellings have articulated facades with large windows. Garages and driveways are dominant features of the front setback.

Figure 65: Emerging Brimbank neighbourhood character precincts



5.6 Areas of Significance

Areas that display a special or intact character that set them apart from other areas may be considered comparatively **significant**. These areas *may* be suitable as minimal change areas (depending on a range of other factors to be balanced in the RDF).

There are several small pockets or streets that display unique or special character features and may warrant additional planning protection. These areas have been identified as having one or more special neighbourhood, heritage, environmental or landscape character features. Any future Neighbourhood Character Strategy should consider whether there is merit to protect this character via additional planning controls such as the NCO.⁸⁹ These areas are outlined in the table below.

Table 12: Areas of significance

Area	Unique / Special Character Features	Description
Sunshine West Kosky Street, Killara Street and Glengala Road	Neighbourhood Character Features Dwelling setbacks, fencing styles and material palette. Predominantly single storey roof form.	Characterised by moderate front setbacks and moderate well maintained landscaping dwellings along Kosky Street, Killara Street and Glengala Road—depict an area of intact neighbourhood character. Dwellings are of similar 1980s era and style development consisting of orange and cream brick materials and hip style roofs in terracotta and brown tile. Fencing styles are low scale in orange brick materials. Dwellings are setback from the street in a uniform style. Carports are located along the side setback behind the dwelling façade. Street trees are generally uniform – olive tree species.

Representative Images



⁸⁹ Note the NCO cannot apply to areas subject to the HO (for example, heritage areas in Albion).

Area	Unique / Special Character Features	Description
Keilor Hislop Street and Eagling Street	Landscape Character Features Dwelling setbacks, front garden landscaping and canopy trees.	<p>Characterised by generous front landscaping which expands to the street edge, established canopy trees and wide streets.</p> <p>Dwellings are low height, substantially set back from the street and screened via front garden landscaping.</p> <p>Gardens are well maintained and include a variety of established native and non-native species.</p> <p>The slope of the land tucks the streets under canopy coverage, screening views to adjoining houses on the hilltop.</p>

Representative Images



Albion HO area

Predominately east of Adelaide Street and north of King Edward Avenue.

Neighbourhood**Character Features and Heritage Character Features**

Characterised by a combination of heritage dwellings with moderate to generous setbacks from the street and dwellings that are not affected by the HO.

Description

Dwellings are typically weatherboard with gable roof styles and chimneys on outside walls.

Dwelling styles are diverse with large front windows and a variety of façade embellishments, including bay windows, shingles and wide eaves.

Front fencing is typically timber picket or farmhouse wire styles which are moderate in height and permeable.

Front landscaping is low-moderate but is not impacted by vehicle parking.

Established trees in the private and public realm contribute to a garden setting.

The subdivision pattern is unique and reflective of a specific era of urban planning.

Representative Images of HO area

Albion outside HO area

Predominately west of Perth Avenue

Neighbourhood**Character Features**

Characterised by streets of uniquely intact brick or weatherboard homes

Description

In some streets (such as Norwood Street), dwellings are typically weatherboard with hipped roofs and low timber or metal fencing.

In other streets, such as Cullen and Gail Courts, dwellings are typically Modern-style orange brick homes (some with brown brick decorative features). Homes are often double or triple fronted, with low pitched hipped rooves. Front fencing is typically low brick fencing with metal detailing or absent entirely.

Representative Images Outside of HO Area⁹⁰



Area	Unique / Special Character Features	Description
Keilor Petrik Drive	Neighbourhood Character Features Characterised by canopy trees within front and rear landscaping and established trees within some front gardens. The street is wide with footpaths on both sides.	<p>The streetscape displays a consistency of spacing and siting of dwellings, and dwellings have well-maintained landscaping and front gardens, often with one or more established canopy trees. The majority of dwellings along the street have an absence of front fencing, contributing to an open setting.</p> <p>Original dwellings are of the 1990s–2000s development era and display similar architecture. While there is a greater degree of upgrades to existing housing stock (resulting in new housing of a similar look and size) than other areas of special character identified in this Report, Petrik Drive exhibits a degree of consistency that contributes to a distinct sense of place. This warrants further investigation through the Neighbourhood Character Strategy.</p>

Representative Images



⁹⁰ Righthand image sourced from Google Maps, August 2019.

5.7 Summary of Findings

- > **State policy direction:** State Policy and direction (Clause 15.01-5S and PPN90) require Council, through Neighbourhood Character and Housing Strategies, to provide clarity and certainty when balancing growth directions with preferred neighbourhood character objectives. At present, this certainty is lacking, as evidenced by the mixed VCAT decision making on this issue. Addressing this matter in a considered way is a key purpose of this Project.
- > **Brimbank City Council's current approach to neighbourhood character:** While existing planning policy establishes an aspiration for high quality development that protects and/or respects neighbourhood character, there is limited guidance on what preferred neighbourhood character means, particularly where character is expected to change because of growth. This has resulted in:
 - o Mixed messages regarding how substantial change and housing growth should be delivered in the RGZ, possibly undermining *Home and Housed* objectives which seek greater density and diversity of housing types in these areas.
 - o Confusion on how incremental change can be achieved in a manner that respects neighbourhood character. As a result, relatively similar types of multi-unit development are occurring across the municipality, regardless of zone.

This Project will enable Council to provide greater design guidance in the RGZ to support well-designed medium to high density development in preferred locations, and to establish neighbourhood character objectives to facilitate respectful infill development in the surrounding neighbourhoods.

- > **Prevailing heights:** Single and double storey heights predominate across most of Brimbank's neighbourhoods, with three storey and above occurring only on occasion, and generally within or close to activity centres. The zone reforms, which place emphasis on heights and allow up to three storeys in the GRZ, does not appear to be threatening neighbourhood character yet. However, this Project will need to carefully consider the impact of the height provisions on character when defining the RDF.
- > **Landscaping, good design and sustainability:** Quality landscaping, good design and measures (such as eaves) to improve sustainability make an important contribution to Brimbank's character as well as overall climate resilience objectives. However, current policy is achieving mixed results. Opportunities have been noted to the strengthen guidance regarding expectations in these areas as part of this Project. Facilitating enhanced landscaping in areas targeted for increased densities will be particularly challenging matter to balance in this Project.
- > **Brimbank's character contributors:** Character across Brimbank varies, however, there are an identified set of features that are common to many areas. These include landscaping, siting and scale of buildings, materials, fencing, connectivity and street layout. Not all neighbourhoods exhibit these contributing features, but where they are present and/or where there are consistencies across areas, they contribute to formation of an emerging Character Type. This Character Type will be used to inform Neighbourhood Character or Design Objectives in future residential zone schedules.
- > **Neighbourhood character threats:** Infill development of incompatible form and style (including heights, bulk, architectural style, materiality and fencing), inadequate landscaping, dominant vehicle access and parking, and poorly integrated mixed-use development, can at times threaten neighbourhood character. The extent to which any or all of these are a threat depends on the area, and in some instances, the extent of change expected in that area. As the Housing Strategy defines change expectations, this Project will then need to outline targeted policy to facilitate better design outcomes.

- > **Areas of Significance:** There are areas in Sunshine West, Keilor and Albion that display a consistent neighbourhood character, or special/ unique characteristics that may warrant additional protection. This will be a key area of investigation for the Neighbourhood Character Strategy.

6. CONCLUSION, EMERGING THEMES AND NEXT STEPS

6.1 Housing

Needs, Opportunities and Constraints

Brimbank's population is growing, ageing, becoming more diverse, and is, increasingly, experiencing housing stress. While there is ample capacity within Brimbank's neighbourhoods to accommodate growth, the type of housing development that is occurring is not meeting the needs of Brimbank's diverse community.

Development in RGZ areas is not achieving the high quality and high-density development anticipated by the substantial change zone, and, despite relatively distinct variations to zones and schedules, most growth is occurring in the form of similar-style infill development in the GRZ and NRZ.

This Project has an opportunity to leverage extensive public sector investment and changes in State policy direction to reshape housing in Brimbank and to make it more accessible, affordable and sustainable.

Opportunities for housing growth are concentrated around activity centres, public transport, high quality open space and community facilities, and where existing neighbourhoods are walkable and have access to high quality cycling and pedestrian infrastructure.

Constraints on housing growth include industrial land, where care needs to be taken to minimise conflicts between incompatible land uses, areas affected by the MAEO and HO, and areas of 'special' neighbourhood character.

Sunshine/Albion, St Albans and, to a lesser extent, Sydenham (around Watergardens) are key opportunities for growth, however, the impact of various constraints will need to be carefully considered and balanced.

With this Project, Brimbank City Council aims to provide more clarity and certainty about its future growth and desired development outcomes.

Emerging themes

In this context, the following themes and Project aims are emerging:

- > **Growth** - Providing the right amount of housing at the appropriate location, typology, and scale to enhance liveability and affordability within Brimbank.
- > **Diversity** – Facilitating different forms of housing to meet the diverse and changing needs of the community, including housing that offers greater choice, equity, adaptability, and affordability.
- > **Amenity** - Minimising land use conflict between existing non-residential uses and areas identified for housing growth.
- > **Sustainability** - Ensuring housing is sustainably designed, is located to minimise car dependence, and contributes to the climate resilience of Brimbank's community.

6.2 Neighbourhood Character

Brimbank's neighbourhood character was traditionally shaped by the housing and subdivision styles typical of the era of development. As the municipality has grown and developed, planning policy (or its absence) has exerted an increasing influence over neighbourhood character.

At present, Brimbank's character is predominantly characterised by single to double storey detached or semi-detached homes, with higher development to three storeys generally only being achieved in the RGZ, despite the

permissible height provisions of the GRZ. Housing forms vary from small weatherboard cottages in the south, to larger homes, of varying materiality in the north.

This report has distilled analysis of individual suburbs into a list of contributors to neighbourhood character, which have then been used to define six emerging character types and precincts. Additionally, several areas of significance have been defined, comprising areas of heritage or uniquely intact character. These include areas around Albion, Sunshine West and Keilor. Threats to character across the character precincts vary but include inappropriate infill development (in terms of design and scale), inadequate landscaping and dominant carparking and access arrangements.

Brimbank's existing policies and zone schedules focus on landscape character and policy focuses on high-quality and innovative design. However, very limited direction is provided regarding character or design expectations across the different zones and how housing diversity can be facilitated, causing uncertainty for residents, the development industry and decision makers.

This Project will need define preferred neighbourhood character and design objectives for each of its character precincts and implement them through appropriate policy and schedule variations.

In doing so, this Project will also need to provide clarity and certainty on how Council intends to balance growth directions (from the Housing Strategy) with preferred neighbourhood character objectives. Addressing this matter in a considered way is a key purpose of this Project.

In this context, three themes and project aims are emerging in relation to neighbourhood character:

- > **Design for density** – Creating denser, yet well designed and well landscaped neighbourhoods in substantial change locations
- > **Respect neighbourhood character** – Supporting diverse, contemporary, and well-designed infill development in incremental change areas that respects neighbourhood character.
- > **Celebrate history and character** – Ensuring well-designed new development carefully integrates with and respects the special places and history of Brimbank in minimal change areas.

6.3 Next Steps

The potential tools we have available to achieve these aims are set out below. It is noted that the use of these tools is contingent upon approval by Council and the decision of Council to request authorisation from the Minister for Planning to prepare a planning scheme amendment.

- > **Growth** – The RDF will identify areas of substantial, incremental, and minimal change, and the appropriate residential zone will be used to implement growth directions.
- > **Diversity** – The various zones will support diverse housing outcomes.
- > **Amenity** – Zones will be used to direct growth away from amenity conflicts, supported by overlays that identify amenity constraints, and policies and actions that can mitigate amenity impacts.
- > **Sustainability** – Zone schedule objectives, application requirements, and decision guidelines can be shaped to emphasise sustainability and support existing ESD policy.
- > **Design for density** – RGZ schedule objectives and ResCode variations will set clear expectations for design outcomes.
- > **Respect neighbourhood character** – GRZ and NRZ schedule neighbourhood character objectives and ResCode variations based on the relevant Character Type will be employed. These will articulate how new development can respect preferred neighbourhood character outcomes.
- > **Celebrate history and character** – Specific NRZ schedules that define the qualities of the area will be used. Where the HO does not apply, and the NRZ schedule cannot sufficiently guide expected outcomes, use of the NCO will be considered.

Beyond the scope of this Project, but flowing onward from it, a combination of increased supply of housing in appropriate locations and policy can be used to guide preferred locations for social and affordable housing and policy and targeted strategies and actions can be used to facilitate genuine diversity and affordability.



Part 3 Appendices

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Part 3: Appendices

7. APPENDICES

7.1 Summary of Zones in Brimbank

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